

# ***Operation California Dreamin'***

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IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA

Abingdon Division

IN THE MATTER OF THE ARRESTS )  
OF SHAWN WAYNE FARRIS, )  
ET AL. )  
)

UNDER SEAL

Case No.

AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR ARREST WARRANTS

I, Christopher L Parks, United States Department of Justice, Drug Enforcement  
Administration, being first duly sworn, hereby depose and state as follows:

I am a Task Force Officer for the United States Drug Enforcement Administration (DEA) and have been assigned this position for approximately four (4) years. I have been employed by the Abingdon Police Department (APD) for approximately seventeen (17) years with the previous twelve (12) years being assigned to investigate drug cases. Prior to working for the APD I worked for approximately one (1) year for the Glade Spring Virginia Police Department and Virginia Highlands Community College Campus Police.

I was trained as a Police Officer at the Southwest Virginia Criminal Justice Training Academy in Bristol, Virginia. During my training at the law enforcement academy I received specialized training in drug laws and drug recognition. Over the past sixteen (16) years I have attended several classes/courses specializing in techniques and procedures to investigate drug cases. This training includes courses that directly relate to possession, manufacturing and distribution of drugs and their subsidiaries and include the drugs, marijuana, cocaine, heroin,

methamphetamine and prescription drugs. For the past nine (9) years I have taught at the law enforcement academy. The course I teach is drug identification and recognition.

The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(C), have been committed, and are being committed, by others known and unknown. .

The information contained in this affidavit is based on my personal observations, observations of other law enforcement officers, observations of Cooperating Sources (CS) as related to me, my review of official police and government reports, my review of records and documents gathered during this investigation, and consultation with other Agents involved in the investigation. This affidavit contains information necessary to support probable cause for the search warrant. The information contained in this affidavit is not intended to include each and every fact and matter observed by or known to the United States.

Numerous search warrants have been executed for the contents of seized cellular telephones as well as text message content on the accounts of active cellular telephones. In addition, call detail records have been received on many target telephones via DEA Administrative Subpoena. A minimal amount of data received as a result of these search warrants and subpoenas has been included in this affidavit to help establish probable cause.

This affidavit is submitted in support of a request that a complaint and arrest warrant(s) be issued for the following person(s) for violations of Title 21, United States Code, Section 846,

Conspiracy to Possess with the Intent to Distribute Methamphetamine:

**PERSONS**

- a) Shawn Wayne FARRIS
- b) Sean Philip MAIDLOW
- c) Jair Medina GUTIERREZ, aka "*Primo*"
- d) Lacey Cheri WEIR
- e) Andrea Nichole STICKEL, aka "*Nikki*"
- f) James Nicholas HOWINGTON, aka "*Nick*"
- g) James Robert JOHNSON, aka "*Jamie*"
- h) Stephen A. GRAHAM
- i) Christopher Lee SMILEY
- j) Joshua Todd CHAPMAN, aka "*Josh*"
- k) Saleemah Lashawn ROBERSON, aka Saleemah EANS
- l) Donald Zachary SNYDER, aka "*Stryker*"
- m) James Skyler SEBASTIAN
- n) Larry Levi BENNETT
- o) Terry Melvin DALTON
- p) Heather Ashley DAVIS, aka Heather Ashley HALL
- q) Brianna Nicole WOODBY, aka Brianna NICKLES
- r) Donald Shane HAWTHORNE
- s) Gary Lee MCFARLANE
- t) Elizabeth Pauline EATON, aka Beth EATON
- u) Matthew Todd MULLINS

- v) Anthony Jerome HARLESS
- w) Kimberly Ann DRAKE, aka "*Mama Kim*"
- x) Brandon Heath WHITT
- y) Melissa Darlene BARRETT
- z) Susan Nicole PAYNE, aka Susan WRIGHT
- aa) Bradley Scott WILLIAMS
- bb) Devon Scott COLEMAN, aka "*Cuz*"

### **INTRODUCTION**

In early 2017, an investigation was initiated into the Shawn FARRIS Drug Trafficking Organization, which was responsible for the trafficking of crystal methamphetamine between Southern California and the areas of Southwest Virginia and Northeast Tennessee. The investigation revealed that FARRIS temporarily moved from Cathedral City, CA to Bristol, VA at the suggestion of close friend Lacey WEIR, a Bristol, TN resident who was originally from California. FARRIS' source of supply for methamphetamine was identified as Raul LOPEZ-VALENZUELA, who was recently indicted in the Southern District of California in a separate DEA investigation.

In addition to FARRIS, WEIR also recruited family member Sean MAIDLOW from Pomona, CA who moved to Bristol, TN. MAIDLOW's source of supply for methamphetamine was identified as Jair Medina GUTIERREZ, who was also a target of a separate DEA investigation.



With FARRIS and MAIDLOW both in Bristol with methamphetamine sources of supply in California, the FARRIS DTO recruited many distributors in the area who sold large amounts of methamphetamine in the Western District of Virginia and Eastern District of Tennessee.

WEIR's boyfriend, John Ratcliff, became a major distributor and enforcer for both FARRIS and MAIDLOW. In July 2017, Ratcliff was arrested in Bristol, TN in possession of 1.3 kilograms of crystal methamphetamine and a gun, which was prosecuted in the Eastern District of Tennessee.

One month prior, Amy Mann, a major distributor of methamphetamine for FARRIS, was arrested in possession of approximately 300 grams of methamphetamine and two (2) firearms, which was prosecuted in the Western District of Virginia.

A common link between Ratcliff and Mann was another major distributor for FARRIS and MAIDLOW, Donald Zachary SNYDER aka "*Stryker*". SNYDER was arrested on June 15, 2017 in Bristol, VA in possession of approximately two (2) ounces of methamphetamine. On August 4, 2017, SNYDER was arrested again in Bristol, VA in possession of approximately 1½ ounces of methamphetamine and a gun.

Other direct distributors of methamphetamine for FARRIS and/or MAIDLOW included Andrea Nichole "*Nikki*" STICKEL, James Nicholas "*Nick*" HOWINGTON, Saleemah Lashawn ROBERSON, James Skyler SEBASTIAN, Larry Levi BENNETT, Terry Melvin DALTON, Heather Ashley DAVIS, Brianna Nicole WOODBY, Donald Shane HAWTHORNE, Melissa Darlene BARRETT, and Bradley Scott WILLIAMS. Other direct distributors included Crystal Pharis and Brandon Thorpe, both of whom were indicted in the Eastern District of Tennessee in a related conspiracy.

Sub-distributors for the organization, those who sold methamphetamine at the direction of John Ratcliff, Amy Mann, "Nikki" STICKEL, Saleemah ROBERSON and others include James "Jamie" JOHNSON, Stephen GRAHAM, Christopher SMILEY, Joshua CHAPMAN, Gary MCFARLANE, Elizabeth EATON, Matthew Todd MULLINS, Anthony HARLESS, Kimberly DRAKE, Brandon WHITT, Susan PAYNE and Devon COLEMAN.

### **PROBABLE CAUSE**

#### **Shawn Wayne FARRIS**

On February 16, 2017, CS-1 was interviewed pursuant to his arrest for Conspiracy to Distribute Methamphetamine in the Eastern District of Tennessee. CS-1 stated that in approximately September 2016, he started obtaining methamphetamine from "J.R." Ratcliff. CS-1 stated that he purchased ounces of methamphetamine from Ratcliff for \$700.00 or \$800.00 per ounce. CS-1 stated that Ratcliff drove a silver Dodge Charger.

CS-1 stated that Ratcliff obtained the methamphetamine from a source of supply who was from California. CS-1 described this source of supply for methamphetamine as a white male in his 40's who drove a silver Ford Mustang. CS-1 stated that this source of supply for methamphetamine lived in a brick house with a long black driveway with two (2) white garage doors located near Virginia High School in Bristol, VA. CS-1 provided directions to the residence.

CS-1 stated that in mid-January 2017, he was at the residence near Virginia High School with Ratcliff and helped count \$250,000.00. CS-1 stated that he observed 49 pounds of crystal methamphetamine in the residence at that time. CS-1 stated that Ratcliff was making plans to rob the methamphetamine source of supply who lived in that house.

CS-1 stated that Lacey WEIR was originally from California and was the connection to the methamphetamine source of supply.

On March 8, 2017, CS-2 was interviewed by law enforcement. CS-2 advised that he had been incarcerated with (CS-1) in January 2017. CS-2 advised that (CS-1) told him that sometime between January 14 and 17, 2017, (CS-1) had observed 49.7 pounds of methamphetamine that had come from California. This information corroborated what (CS-1) advised law enforcement when he was interviewed.

On March 29, 2017, SA Brewer conducted a spot surveillance at 600 Garden Ln., Bristol, VA. The residence was a brick house with two (2) white garage doors down a long asphalt driveway, approximately two (2) blocks from Virginia High School. SA Brewer believed this to be the house described by CS-1 where he observed 49 pounds of crystal methamphetamine and \$250,000.00. SA Brewer observed a silver Dodge Charger parked in the driveway, which may have been the vehicle CS-1 described as belonging to "J.R." Ratcliff.

On March 30, 2017, ATF SA Justin Masuhr conducted a drive by surveillance at 600 Garden Ln., Bristol, VA. SA Masuhr observed the same Dodge Charger, as well as a silver Ford Mustang parked in the driveway at the residence, which may have been the vehicle CS-1 described as belonging to the methamphetamine source of supply from California. According to the records of the Tennessee Dept. of Motor Vehicles, a silver Ford Mustang was registered to John Ratcliff, Jr. and Alba S. Perez at 769 Beechwood Dr., Bristol, TN.

On June 1, 2017, CS-3 was interviewed by law enforcement. CS-3 identified Shawn FARRIS as one of her sources of supply for methamphetamine. CS-3 stated that she had been purchasing methamphetamine from FARRIS since the beginning of 2017. CS-3 stated that she had obtained methamphetamine practically every day, one (1) to two (2) ounces each time. CS-3



stated that FARRIS gave CS-3 the methamphetamine and after it was sold, she would pay him back \$700 per ounce.

CS-3 stated that Levi BENNETT owed FARRIS \$28,000.00 for 7 pounds of methamphetamine. CS-3 stated that FARRIS had assaulted BENNETT a few days prior to BENNETT's arrest. CS-3 advised that the times she purchased methamphetamine from FARRIS, she contacted FARRIS on his cellular telephone. CS-3 advised that the cell phone number for FARRIS would be located in her phone. CS-3 granted permission for her phone to be searched. In the contacts section of the phone agents found the number (276) 591-7287 under the name "*The Man*".

On July 20, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated the following:

Shawn FARRIS was transporting methamphetamine from California to Bristol, VA. The week prior to CS-4's arrest, FARRIS dropped off ½ pound of methamphetamine at CS-4's residence, which was picked up by Brandon Thorpe. CS-4 stated that Zach SNYDER, aka "*Stryker*", distributed methamphetamine for FARRIS, as well as collected drug debts and acted as an enforcer. CS-4 stated that "*J.R.*" Ratcliff, "*Dee Dee*" (Crystal Pharis), and Levi BENNETT also sold methamphetamine for FARRIS.

On June 23, 2017 law enforcement conducted a trash pull at 600 Garden Lane Bristol, VA, the known residence of Shawn FARRIS. A trash pull is a tool for law enforcement wherein the trash of the target residence is discarded at the curb to be picked up. Found during the search was mail belonging to FARRIS, two (2) cell phone boxes, several plastic bags that had previously been heat sealed and receipts from restaurants located in California. Your affiant

knows that it is common for drug traffickers to transport drugs, especially over long distances, in heat sealed containers to avoid detection of the drugs by law enforcement.

On June 29, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 591-7287 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from June 20 to June 29, 2017. The following is an excerpt from the search warrant results:

**June 21, 2017**

FARRIS to (423) 438-3912 (John Ratcliff), *"I haven't done anything to you so quit texting me"*

Ratcliff to FARRIS, *"Well ur talking about beating my ass n shit and then I find out u called pretty much the cops on me and said I was a drug dealer so I mean hell bro what else is there I'm gonna find out"*

FARRIS to Ratcliff, *"I never called anyone"*

Ratcliff to FARRIS, *"That u made someone come 2000 miles away to deal with a situation and put it off on me when it had none of my doings and ur trying to get me arrested yea I get it"*

FARRIS to Ratcliff, *"No we don't feel with cops cops are not part of our lives we don't call them for any reason"*

Ratcliff to FARRIS, *"...I'm telling u now bro u crossed the line on this one"*

FARRIS to Ratcliff, *"No JR you burnt me and then tried to get rid of me so you could take everything I got well you can stay broke now because I'm never doing anything with you agin"*

Ratcliff to FARRIS, *"I'm over it man I can look past the bullshit I'm more of a man than to hold grudges over anyone but when it comes to my family and shit being said about beating my baby out of Lacey's belly and how my life is over bro it's just to much for me bc that's personal..."*

FARRIS to Ratcliff, *"What want JR for me to say I'm sorry for saying I will beat the baby out of her. I guess that was a little mean and I am sorry for that one"*

Ratcliff to FARRIS, *"I don't need apologies man we are all men we say shit when we are mad I'm over it dude really to much ahit has been done to go back to how things were I left it all alone and I ask u do the same"*

FARRIS to Ratcliff, *"I already did that then you started back up"*

Ratcliff to FARRIS, *"Not when u send ppl from Cali to handle me as u said u planned on remember but again I'm done with it bro no need to continue"*

Based on my training and experience, and my knowledge of this investigation, I believe that Shawn FARRIS and John Ratcliff utilized their cellular telephone to discuss how FARRIS called the police on Ratcliff and reported him as a drug dealer. I believe that FARRIS denied this, but admitted to threatening Ratcliff and his girlfriend, Lacey WEIR. I believe that Ratcliff accused FARRIS of having people from California come to Bristol to collect money from Ratcliff. I believe that this conversation stemmed from FARRIS accusing Ratcliff of stealing drug proceeds from FARRIS.

**June 22, 2017**

FARRIS to (760) 970-5433 (Davisa Martinez), *"Davisa I'm sending money to your house for Chaubooa I will send you some for letting me ok"*

FARRIS to Martinez, *"I need you to text me you address"*

Martinez to FARRIS, "68238 Via Domingo DHS 92240"

FARRIS to Martinez, "Thanks"

Martinez to FARRIS, "Raul has good shit right now y arent u getn from him espescially since its chesper"

Martinez to FARRIS, "Of course anything 4 u"

Martinez to FARRIS, "U dont have 2 send me money 4 letting u thats what frenz r 4"

FARRIS to Martinez, "I need to have it delivers and Chaubooa has it beautiful to me"

FARRIS to Martinez, "Ok I sent 5000 and I will send 9000 tomorrow. I didn't want to send all my eggs in one shot"

FARRIS to Martinez, "They said it will be at your house by 8:00pm"

Based on my training and experience and knowledge of this investigation, I believe that Shawn FARRIS communicated with Davisa Martinez in Desert Hot Springs, CA ("DHS"). I believe that FARRIS paid Martinez to send money to Martinez's house (\$5,000.00 and \$9,000.00) to be delivered to "Chaubooa" for methamphetamine. Martinez told FARRIS that Raul Lopez ("Raul") had good methamphetamine and told him it was cheaper and asked why he didn't get methamphetamine through him. FARRIS told Martinez that the reason he did not get methamphetamine through Lopez was because he did not deliver it and "Chaubooa" did.

#### **June 27, 2017**

(706) 748-8943 (Saleemah Roberson) to FARRIS, "Hey this is Saleemah look Levi went to jail and I had gave him the majority of it and nobody was trying to pay u brought what I had to GA and Rico robbed me"

FARRIS to Roberson, *"Why couldn't you of told me this sooner and why has JR bean lying saying he didn't no what happens Levi only got busted with a half do you no where the rest is at"*

Roberson to FARRIS, *"K no Dee was suppose to round it up but then she went to jail and JR really hadn't spoken to me even now I left my phone at a truck stop k in Alabama"*

FARRIS to Roberson, *"Do you no were JR mite have it at"*

Roberson to FARRIS, *"I haven't been in touch with anyone I was terrified 49000 its what Levi had to give me I just got all my google contacts I'm going to send us number to someone who said they know everyone who had money for Levi"*

FARRIS to Roberson, *"Because JR acted like it was no big deal and never looked for it so I accused him of stilling it from me I thank he has it but he says he didn't"*

Roberson to FARRIS, *"No I didn't think he had it because he would have paid you"*

Based on my training and experience and knowledge of this investigation, I believe that Saleemah Roberson utilized the text messaging service of her cellular telephone to contact Shawn FARRIS. During the conversation they talked about a \$49,000.00 drug debt that Levi BENNETT owed to FARRIS. BENNETT went to jail and FARRIS thought that "JR" (John Ratcliff) had the money that was owed to him.

On July 26, 2017, John Ratcliff was arrested in Bristol, TN pursuant to an outstanding warrant for violation of probation. Based on a 4<sup>th</sup> Amendment waiver, to which Ratcliff had previously agreed to as part of his probation, a search was conducted at his residence. Approximately 1.3 kilograms of crystal methamphetamine and a handgun were seized from Ratcliff's bedroom.



Subsequent to his arrest, Ratcliff agreed to be interviewed by agents. Ratcliff stated that the two (2) largest methamphetamine distributors in the area were Shawn FARRIS and Sean MAIDLOW, both from California. Ratcliff stated that he worked for both FARRIS and MAIDLOW to collect drug proceeds and to introduce them to drug distributors. Ratcliff stated that FARRIS drove his methamphetamine from California, and MAIDLOW had it mailed here to different addresses. Ratcliff stated that FARRIS was driving a new Dodge Challenger registered in the name of "*Nikki*" STICKEL. Ratcliff advised that FARRIS printed receipts from his computer to make it look like he had won money at casinos in case it was detected by law enforcement.

Ratcliff advised that on occasion, FARRIS mailed money to Desert Hot Springs, California to "Tim" and "Lori". Ratcliff provided the address of 5 Sand Creek Drive, Cathedral City, CA as a location where money was sent.

Ratcliff stated that FARRIS' telephone number was saved under "*Sean*" and MAIDLOW's cellular telephone number was saved under "*Sean Sean*" in his cellular telephone. Ratcliff agreed to let agents search his cellular telephone.

Saved under "*Sean*" was telephone number (276) 591-7287, a known telephone number for Shawn FARRIS. According to the records of Verizon Wireless, telephone number (276) 591-7287 was subscribed to by Shawn FARRIS at 600 Garden Ln., Bristol, VA.

On August 16, 2017, James Nicholas HOWINGTON was interviewed in Abingdon, VA. HOWINGTON stated that he was a distributor of methamphetamine for Shawn LNU (last name unknown). HOWINGTON stated that Shawn LNU was from California and currently lived in a house located near Virginia High School. HOWINGTON stated that Shawn LNU used to drive a

silver Dodge Charger, but was currently driving a new Dodge Challenger registered to “Nikki” STICKEL.

HOWINGTON stated that he had obtained methamphetamine from Shawn LNU on only two (2) occasions, twelve (12) ounces each time. HOWINGTON stated that Shawn LNU also provided HOWINGTON with two (2) ounces of heroin. HOWINGTON also stated that he was present at Shawn LNU’s residence on one (1) occasion when he received a package from California. HOWINGTON was directed by Shawn LNU to open and unpackage the contents. HOWINGTON advised that the package contained three (3) heat sealed bags and each bag contained either one (1) pound or one (1) kilo each of methamphetamine. HOWINGTON provided additional information on Lacey WEIR, “J.R.” Ratcliff, “Nikki” STICKEL, Sophia LNU (McMurray), and others who were involved in the distribution of methamphetamine with Shawn LNU.

On August 30, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 791-6721 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from August 19 to August 25, 2017. The following is an excerpt from the search warrant results:

**August 20, 2017**

FARRIS to (276) 274-6648 (Darlene BARRETT), “*Don't no it was Sunday I will send it in the morning*”

BARRETT to FARRIS, “*Damn*”

BARRETT to FARRIS, “*Ok*”

Based on my training and experience, and my knowledge of this investigation I believe that Shawn FARRIS utilized the text messaging service of his cellular telephone to contact Darlene BARRETT. I believe that FARRIS told BARRETT that he was not able to send a package of methamphetamine to her because it was Sunday. I believe that FARRIS told BARRETT he would send the methamphetamine the next day.

**August 25, 2017**

(276) 274-6648 (Darlene BARRETT) to (276)791-6721 (FARRIS), *"Why 15 when it's been 14"*

FARRIS to BARRETT, *"Because the blue stuff was extra"*

BARRETT to FARRIS, *"Damn we each got one blue so 7500 a piece"*

FARRIS to BARRETT, *"Yes"*

BARRETT to FARRIS, *"Ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Darlene BARRETT utilized the text messaging service of her cellular telephone to contact Shawn FARRIS on his cellular telephone. I believe that BARRETT asked FARRIS why he sent her 15 ounces of methamphetamine when she usually received 14 ounces, *"Why 15 when it's been 14"*. I believe that FARRIS advised BARRETT that they received an extra ounce of "blue" methamphetamine free of charge. I believe that BARRETT then confirmed that she would owe \$7,500.00 for the methamphetamine she received, *"Damn we each got one blue so 7500 a piece"*

On September 13, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 791-6721 (Shawn FARRIS). In response to the execution of this search warrant on Verizon

Wireless, agents received text messages stored in those accounts from August 30 to September 13, 2017. The following is an excerpt from the search warrant results:

**September 11, 2017**

(276) 206-0368 (Bradley WILLIAMS) to FARRIS, *"Hey bro, everything ok?"*

FARRIS to WILLIAMS, *"Address please"*

WILLIAMS to FARRIS, *"209 B Street Abingdon, VA 24210"*

WILLIAMS to FARRIS, *"You have my address right"*

FARRIS to WILLIAMS, *"That's what I was looking for I just need house number and zip"*

**September 12, 2017**

FARRIS to WILLIAMS, *"I sent some boxes for you to send money"*

WILLIAMS to FARRIS, *"Ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brad WILLIAMS and Shawn FARRIS utilized the text messaging services of their cellular telephones to engage in a conversation. I believe that WILLIAMS provided an address to FARRIS to which FARRIS sent a package of methamphetamine. I also believe that FARRIS advised WILLIAMS that he included shipping boxes in the package of methamphetamine for WILLIAMS to send money to FARRIS once the methamphetamine was sold. The address used to send the package to WILLIAMS was 209 B Street Abingdon, VA. According to the Abingdon, VA Police Department's database, this was the known address of Charlotte Finch. Your affiant is aware that Charlotte Finch is the on again, off again girlfriend of WILLIAMS and she is the mother of WILLIAMS' children.

On September 19, 2017, Bradley WILLIAMS was arrested with approximately one (1) ounce of methamphetamine and approximately \$4,400.00. CS-6 was interviewed and advised that WILLIAMS had obtained the methamphetamine from Darlene BARRETT. CS-6 stated that he/she had been with WILLIAMS on multiple occasions when he delivered methamphetamine for BARRETT.

On September 27, 2017, CS-31 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Greeneville, TN. CS-31 stated that he had been introduced to "Shawn" who was from California. CS-31 stated that "Shawn" had bought a house located on the Virginia side of Bristol. CS-31 stated that "Shawn" left for days at a time and drove to California to pick up methamphetamine. CS-31 stated that on one (1) occasion, he saw vacuum sealed bags at "Shawn's" residence that contained methamphetamine. CS-31 stated that he was introduced to "Shawn" by Brianna WOODBY. Based on your affiant's knowledge of this investigation, your affiant believes that when referring to "Shawn", CS-31 was referring to Shawn FARRIS.

On November 1, 2017, CS-3 was interviewed again by law enforcement. CS-3 stated that Shawn FARRIS was the person who was currently bringing all the methamphetamine to the area. CS-3 advised that Larry Addair used to work for FARRIS before his murder. CS-3 advised that she had known FARRIS for approximately one (1) year. CS-3 advised that she obtained methamphetamine from FARRIS, about one (1) ounce per week for the last six (6) months, approximately twenty four (24) ounces total. CS-3 advised that she really didn't sell the methamphetamine, that Levi BENNETT did most of the selling.

CS-3 advised that a few days after BENNETT last went to jail in Virginia, FARRIS came to her residence claiming that BENNETT owed him \$40,000.00 for seven (7) pounds of



methamphetamine. CS-3 advised that she did not know anything about that, she had never seen BENNETT with seven (7) pounds of methamphetamine, the most she had ever seen BENNETT with was two (2) pounds. CS-3 advised that the seven (7) pounds of methamphetamine was supposedly “fronted” to Saleemah ROBERSON, who in turn “fronted” the methamphetamine to BENNETT for resale.

On March 15, 2018, the United States Postal Service discovered a package that was mailed from California to Darlene BARRETT at 240 Campbell Street Abingdon, VA. The USPS intercepted the package and after a police K-9 alerted to the package having an illegal narcotic inside of it, a search warrant was obtained by the USPS. A crystal like substance was found inside the package that was field tested and was positive for methamphetamine.

The methamphetamine was replaced with a “fake” substance and repackaged in the original package. A federal search warrant was obtained for 240 Campbell Street Abingdon, VA (known residence of Melissa Darlene BARRETT). On March 16, 2018, the package of methamphetamine was delivered by the USPS and after the package was taken from the mailbox, the search warrant was served.

Several items were found during the search and they included the following items: the package of “fake” methamphetamine that was delivered by USPS, two (2) sets of digital scales, several empty zip style bags and other items.

The following text message was recovered from BARRETT’s phone:

**March 16, 2018**

(276) 791-6721 (Shawn FARRIS) to (276) 274-6648 (Darlene BARRETT), *“It’s there”*

Based on my training and experience, and knowledge of this investigation, I believe that Shawn FARRIS advised Darlene BARRETT that the package of methamphetamine he sent her had arrived at her house. I believe that FARRIS had been tracking the package via the United States Postal Service tracking number.

BARRETT was interviewed by law enforcement on the same day. Before the interview started, BARRETT was advised of her Miranda rights and she acknowledged she understood them and agreed to speak with law enforcement. During the interview BARRETT stated that her source of supply for methamphetamine was Shawn FARRIS. BARRETT advised that she met FARRIS in January 2017 through a mutual friend, John Ratcliff. BARRETT purchased 1/8 ounce of methamphetamine for \$225.00 from FARRIS during the first meeting. For the next four (4) months BARRETT purchased 1/8 ounce of methamphetamine from FARRIS two (2) to three (3) time per week for \$200.00 each. After four (4) months, FARRIS "fronted" one (1) ounce of methamphetamine for \$700.00. BARRETT was then "fronted" one (1) ounce of methamphetamine per week for the next four (4) to five (5) months. After FARRIS moved back to California, he started mailing the methamphetamine to BARRETT. During the last three (3) to four (4) months FARRIS has been fronting 1/4 pound quantities of methamphetamine to BARRETT for \$1,750.00. The packages with 1/4 pound quantities arrived every week or two. Once or twice the packages that FARRIS sent to BARRETT only contained one (1) ounce of methamphetamine. BARRETT advised there was a six (6) week period when she did not receive any methamphetamine from FARRIS. BARRETT advised that she would owe FARRIS \$1,750.00 for every four (4) ounces of methamphetamine she received from him. FARRIS advised BARRETT to never sign for packages. BARRETT advised that she used the Postal Service to mail the money back to FARRIS. She placed the United States currency into a little

yellow, plastic, bubble wrap lined envelope with the currency inside. She then placed the envelope inside of a USPS Priority Mail Box and mailed the package to Shawn FARRIS at 253 Standing Bear Road, Cathedral City, CA.

Cooperating with law enforcement, BARRETT and FARRIS engaged in the following conversation via text message:

**March 19, 2018**

FARRIS to BARRETT, *"Just wondering if you sent that today. And need to know if you are ready"*

BARRETT to FARRIS, *"No you"*

BARRETT to FARRIS, *"Not ready"*

Based on my training and experience, and my knowledge of this investigation, I believe that Shawn FARRIS asked Darlene BARRETT if she had sent the money for the methamphetamine to him and asked her if she was ready for him to send another package of methamphetamine, to which she replied that she had not sent the money and she was not ready for more methamphetamine.

On April 5, 2018, Shawn FARRIS sent a second package addressed to Darlene BARRETT. With BARRETT's consent, the package was intercepted by the United States Postal Service (USPS). The package was opened and was found to contain approximately four (4) ounces of a crystal substance that was field tested and was positive for methamphetamine. After the package was intercepted, law enforcement met with BARRETT and \$1,750.00 was sent to

FARRIS from BARRETT using Official Government Funds (ATF Funds). The money was tracked through the USPS.

On April 13, 2018 a third package was intercepted by law enforcement. The package was sent from Shawn FARRIS to Darlene BARRETT. BARRETT gave consent for the package to be opened by law enforcement. The package was found to contain a crystal substance that was field tested and was found to be positive for methamphetamine.

According to the records of NCIC, Shawn Wayne FARRIS was arrested in 1985 for Possession of a Controlled Substance and Unlawful Carrying of a Weapon (no disposition). FARRIS was convicted in 1993 for Possession of Concentrated Cannabis, and in 2001 for Possession of a Controlled Substance. In 2006, FARRIS was convicted of Possession of a Controlled Substance and Manufacturing Methamphetamine. In 2010, FARRIS was arrested for Possession of a Controlled Substance for Sale (dismissed) and Possession of a Prohibited Weapon (convicted). In 2011, FARRIS was convicted of Possession of a Controlled Substance for Sale. In 2016, FARRIS was arrested for Possession of a Controlled Substance for Sale and Felon in Possession of a Firearm (no dispositions).

**Sean Philip MAIDLOW**

According to the records of T-Mobile, the subscriber to telephone number (909) 441-8562 was Sean MAIDLOW at 1724 Appleton Way, Pomona, CA.

On January 13, 2017, a search warrant was executed at 119 Honaker Dr., Bristol, TN, the residence of James Mullins. Seized pursuant to the search warrant were approximately three (3) ounces of crystal methamphetamine, digital scales, \$3,015.00 U.S. Currency, eight (8) firearms, and several cellular telephones. A search of the cellular telephone utilizing telephone number

(423) 217-2526 revealed the following text messages with telephone number (909) 441-8562 (saved as "*Shawn Cal*"):

**December 28, 2016**

(909) 441-8562 (Sean MAIDLOW) to Mullins, "*I'm good so come get it*"

Mullins to MAIDLOW, "*Be there in 15 bro*"

Mullins to (276) 791-1657 (Ryan Jones), "*Het bro diff supplier just now goin after*"

Mullins to Jones, "*Gonba be 400 a q. 700. Half,,1100 whole*"

MAIDLOW to Mullins, "*I'm weighing it now*"

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW notified Jamie Mullins that he had methamphetamine for sale. I believe that Mullins advised a methamphetamine customer, Ryan Jones, that he had a new supplier and was charging \$400.00 for ¼ ounce, \$700.00 for ½ ounce, and \$1,100.00 for a whole ounce of methamphetamine.

**December 30, 2016**

MAIDLOW to Mullins, "*How you doing*"

Mullins to MAIDLOW, "*Xhey bro I got a dinner of cooked cabbage bring u shortly*"

MAIDLOW to Mullins, "*Nice see you soon*"

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW sent a text to Jamie Mullins asking if he had drug proceeds to pay to



MAIDLOW. I believe that Mullins affirmed that he had money for MAIDLOW ("*cabbage*") and would be there shortly.

**January 3, 2017**

Mullins to MAIDLOW, "*I got some dinner for ya in lil byt*"

Mullins to MAIDLOW, "*Cooked cabbGe again*"

MAIDLOW to Mullins, "*Ok cool I have to send some to get some this time*"

Mullins to MAIDLOW, "*K*"

Based on my training and experience, and my knowledge of this investigation, I believe that Jamie Mullins advised Sean MAIDLOW that he had drug proceeds to pay to MAIDLOW ("*cabbage*"). I believe that MAIDLOW advised Mullins that he needed the money to order additional methamphetamine ("*send some to get some*").

**January 5, 2017**

MAIDLOW to Mullins, "*Is everything cool with Lacy's baby Daddy*"

MAIDLOW to Mullins, "*U od 95 -400 so91 now we r at 5630*"

Mullins to MAIDLOW, "*Got ya bud I'll have it tomorrow :)*"

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW inquired of Jamie Mullins if John Ratcliff ("*Lacy's baby daddy*") was cool. I believe that MAIDLOW advised Mullins that his drug debt was \$9,500.00 minus \$400.00 which equaled \$9,100.00, minus what was just paid with a final debt of \$5,630.00.

**January 7, 2017**

Mullins to MAIDLOW, *"Hey bro I'll get over this evening"*

Mullins to MAIDLOW, *"With cabbage for dinner"*

MAIDLOW to Mullins, *"Ok I need some hungry going to look at a truck for sale so need it asap"*

Based on my training and experience, and my knowledge of this investigation, I believe that Jamie Mullins advised Sean MAIDLOW that he was going to bring drug proceeds (*"cabbage"*) to MAIDLOW.

On February 16, 2017, CS-1 was interviewed in Bristol, TN. CS-1 stated that he purchased ounces of methamphetamine at a time from "J.R." Ratcliff. CS-1 stated that Ratcliff was supplied methamphetamine by two (2) guys from California. CS-1 stated that Ratcliff was introduced to the methamphetamine sources of supply by Lacey WEIR. CS-1 described Shawn FARRIS and Sean MAIDLOW as the two (2) California guys who supplied Ratcliff with methamphetamine.

On June 1, 2017, CS-3 was interviewed in Bristol, VA. CS-3 stated that she purchased methamphetamine from Shawn FARRIS, Sean MAIDLOW aka *"Cal"*, Terry DALTON, Heather Ashley DAVIS, Gary MCFARLANE, Skyler SEBASTIAN and others.

On July 26, 2017, John Ratcliff was interviewed pursuant to his arrest for possession of 1.3 kilograms of crystal methamphetamine and a gun. Ratcliff advised that Sean MAIDLOW made Ratcliff keep the methamphetamine at his house to keep him under control. Ratcliff advised that MAIDLOW was from California and MAIDLOW had methamphetamine shipped to

him through the mail. Ratcliff stated that MAIDLOW often switched the location to where the methamphetamine was shipped. Once the methamphetamine was sold, MAIDLOW shipped the money (proceeds from sale) back to California the same way. Ratcliff told Agents that MAIDLOW was "small" and only had a couple of pounds shipped here at a time.

Ratcliff stated that MAIDLOW's cellular telephone number was saved in his phone under "Sean Sean". Ratcliff consented to let agents search his phone. Telephone number (423) 366-7544 was saved in Ratcliff's phone under "Sean Sean". The following text messages were contained on Ratcliff's phone with MAIDLOW:

**July 3, 2017**

Ratcliff to MAIDLOW, *"I turned that stuff around yesterday I wasn't happy with the quality"*

MAIDLOW to Ratcliff, *"So what happened, did you get it"*

Ratcliff to MAIDLOW, *"No I was not happy with the quality of the work at hand it didn't seem right so I had dude turn it around"*

MAIDLOW to Ratcliff, *"Ok"*

Ratcliff to MAIDLOW, *"All that bullshit for there bullshit wasn't good enough for me and I said nope I'll go home first"*

MAIDLOW to Ratcliff, *"Shit that suck well at least we still have the money to send back"*

Ratcliff to MAIDLOW, *"Yea I got \$6500 of it right now and then the rest Lema is coming with for what I bought and returned"*

Ratcliff to MAIDLOW, *"I left it in her house and dude is coming to see her now with it and she is gonna meet me in Erwin with the rest as soon as they are done"*

MAIDLOW to Ratcliff, *"So the 10 I gave you plus the seven he has all ready plus the 3 I have that 20 so we r still good"*

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff had made a trip to Georgia to obtain methamphetamine from Saleemah ROBERSON ("*Lema*"). I believe that Ratcliff took \$10,000.00 of Sean MAIDLOW's money, but was not happy with the quality of the methamphetamine, so returned with \$6,500.00 and was awaiting the rest when ROBERSON came up to Erwin, TN. I believe that MAIDLOW confirmed that they had \$20,000.00 between them to purchase more methamphetamine.

According to the records of AT&T, the subscriber to telephone number (423) 366-7544 was Maidlow Plumbing at 1412 Windsor Ave., Bristol, TN with a contact name of Sean MAIDLOW and email address Maidlow7326@gmail.com.

On August 9, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone numbers (276) 206-0158 (Donald Zachary SNYDER) and (276) 274-6648 (Darlene BARRETT). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from July 25 to August 1, 2017. The following is an excerpt from the search warrant results:

**July 26, 2017**

(423) 366-7544 (Sean MAIDLOW) to SNYDER, *"Hey I'm good"*

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW contacted Donald Zachary SNYDER to advise SNYDER that MAIDLOW had methamphetamine for sale.

As the result of an investigation conducted by DEA Riverside (California), several telephone calls and text messages were captured between telephone numbers (423) 366-7544 (Sean MAIDLOW) and (909) 667-9085 (Jair GUTIERREZ, aka "*Primo*"). The following are text messages between the two:

**September 25, 2017**

MAIDLOW to GUTIERREZ, "*Can you send me some more Spanish-speaking books today or tomorrow*"

GUTIERREZ to MAIDLOW, "*Ima try today, but tomorrow latest.... I'm just missin 1 dictionary*"

MAIDLOW to GUTIERREZ, "*Ok*"

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW ordered methamphetamine ("*Spanish-speaking books*") from Jair GUTIERREZ. I believe that GUTIERREZ told MAIDLOW that he would send it tomorrow at the latest.

On September 26, 2017, at the direction of law enforcement, CS-5 exchanged the following text messages with telephone number (423) 366-7544 (Sean MAIDLOW):

CS-5 to MAIDLOW, "*Yo are we gonna be good today? Wanted to see if I could make a few calls n get some things going or not*"



MAIDLOW to CS-5, *"Tomorrow I'll b good"*

CS-5 to MAIDLOW, *"Ok bro"*

On September 28, 2017, CS-5 (working for the 2<sup>nd</sup> Judicial District Drug Task Force and acting at their direction) met with Sean MAIDLOW at 1205 Florida Ave., Bristol, TN and received four (4) ounces of crystal methamphetamine. CS-5 and MAIDLOW had previously agreed that the methamphetamine would be "fronted" and the CS would pay MAIDLOW \$2,600.00 after it was sold. Prior to the transaction, CS-5 was in communication with MAIDLOW on telephone number (423) 366-7544. This transaction was controlled and monitored by law enforcement.

On October 1, 2017, CS-5 met with MAIDLOW at 1205 Florida Ave., Bristol, TN and paid him \$2,600.00 OAF (Official Advanced Funds) for the four (4) ounces of crystal methamphetamine obtained on September 28, 2017. Prior to the transaction, CS-5 was in communication with MAIDLOW on telephone number (423) 366-7544. MAIDLOW advised CS-5 that next time, the CS could have eight (8) ounces of methamphetamine for \$5,000.00. This transaction was controlled and monitored by law enforcement.

As a result of the Riverside DEA investigation, the following telephone calls and text messages were captured between Sean MAIDLOW and Jair GUTIERREZ:

**October 2, 2017**

(Telephone Call)

GUTIERREZ asked MAIDLOW if he was done. MAIDLOW told GUTIERREZ that he was done, but it was too late to send it.

Both MAIDLOW and GUTIERREZ verified that they should send it to the same addresses. GUTIERREZ told MAIDLOW that they would both send it tomorrow.

Based on my training and experience, and my knowledge of this investigation, I believe that Jair GUTIERREZ inquired of Sean MAIDLOW if he was done selling the last methamphetamine that GUTIERREZ sent. I believe that MAIDLOW told GUTIERREZ that he was done selling it, but it was too late in the day to send him the money. I believe that GUTIERREZ agreed to send more methamphetamine the next day, and MAIDLOW agreed to send the money.

**October 3, 2017**

(Text Messages)

GUTIERREZ to MAIDLOW, *"Let me know when u do that plz"*

MAIDLOW to GUTIERREZ, *"Ok I will"*

GUTIERREZ to MAIDLOW, *"Thanks bro"*

MAIDLOW to GUTIERREZ, *"We good"*

GUTIERREZ to MAIDLOW, *"Thank u"*

GUTIERREZ to MAIDLOW, *"Be ready"*

MAIDLOW to GUTIERREZ, *"Be careful"*

GUTIERREZ to MAIDLOW, *"Same place?"*

MAIDLOW to GUTIERREZ, *"Yes"*

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW advised Jair GUTIERREZ when he sent the drug proceeds to GUTIERREZ ("*we good*"). I believe that GUTIERREZ told MAIDLOW to be ready to receive methamphetamine at the same address as before.

**October 4, 2017**

(Text Messages)

GUTIERREZ to MAIDLOW, "*Is in ur city be ready*"

MAIDLOW to GUTIERREZ, "*What time is it scheduled to be here*"

MAIDLOW to GUTIERREZ, "*8:30 or 10:30*"

GUTIERREZ to MAIDLOW, "*1030*"

MAIDLOW to GUTIERREZ, "*Okay*"

(Telephone call)

MAIDLOW advised GUTIERREZ that the quality received was really, really good. However, the amount was two (2) ounces short. MAIDLOW told GUTIERREZ that he only received 14 ounces and 11 grams.

GUTIERREZ told MAIDLOW that he had done it himself, put it on the scale and everything. GUTIERREZ stated that he started doing it himself now. GUTIERREZ told MAIDLOW that he was missing 1½. GUTIERREZ stated that he would take care of MAIDLOW.

GUTIERREZ asked MAIDLOW about the quality, and said that this was a new supplier. MAIDLOW said that it was very good. GUTIERREZ told MAIDLOW to know who he was working with and not to deal with new people. GUTIERREZ told MAIDLOW that once his customers got ahold of this, others would come.

MAIDLOW told GUTIERREZ that the last stuff had a weird taste. GUTIERREZ said not to worry, this new guy was the main guy. GUTIERREZ told MAIDLOW that he had 20 of those motherfuckers and they would be good for a minute.

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW received methamphetamine from Jair GUTIERREZ, scheduled to be delivered at 10:30 a.m. on October 4, 2017. I believe that the methamphetamine was supposed to be one (1) pound (16 ounces), however only weighted 14 ounces and 11 grams. I believe that GUTIERREZ agreed to make it up, and they talked about how the quality of this methamphetamine was better than the last. I believe that GUTIERREZ found a new source of supply for methamphetamine and had 20 pounds in his possession.

On October 4, 2017, acting at the direction of the 2<sup>nd</sup> DTF, CS-5 met with Sean MAIDLOW at 1101 Broad St., Bristol, TN and received approximately eight (8) ounces of crystal methamphetamine. CS-5 and MAIDLOW had previously arranged the transaction so that the CS could pay MAIDLOW \$5,000.00 at a later date. Prior to the transaction, the CS was in communication with MAIDLOW on telephone number (423) 366-7544. This transaction was controlled and monitored by law enforcement.

On October 9, 2017, acting at the direction of the 2<sup>nd</sup> DTF, CS-5 met with Sean MAIDLOW at 1101 Broad St., Bristol, TN and paid him \$2,500.00 OAF for half of the

methamphetamine obtained on October 4, 2017. This transaction was controlled and monitored by law enforcement.

On October 12, 2017, CS-5 met with MAIDLOW at 447 Beechwood Circle Bristol, TN to pay MAIDLOW the balance owed for the methamphetamine obtained on October 4, 2017. CS-5 was given another \$2,500.00 OAF to give to MAIDLOW, but MAIDLOW only took \$2,300.00 and let the CS keep the other \$200.00. This transaction was controlled and monitored by law enforcement.

On February 2, 2018, CS-7 was interviewed by law enforcement regarding his knowledge of drug distribution in Northeast, TN and Southwest, VA. CS-7 stated that in June 2016, he was introduced to Lacey WEIR by "Rodney and Vickie" from Bristol, VA. CS-7 stated that when he first met WEIR, she gave him a couple of "8 balls" (1/8 ounce) of methamphetamine to sell. CS-7 stated that WEIR was more of a contact for bringing people together to buy and sell methamphetamine than she was a distributor herself. CS-7 stated that WEIR knew all the boys from California.

CS-7 stated that sometime around September or October 2016, WEIR introduced him to "Sean" LNU from California, for whom WEIR was supposedly selling methamphetamine. CS-7 stated that "Sean" lived on Windsor Avenue in Bristol, Tennessee. CS-7 stated that "Sean" was getting methamphetamine sent to him via the United States postal Service (USPS). CS-7 stated that in or around December 2016, he observed a box in "Sean's" possession that contained approximately twenty (20) pounds of methamphetamine. Based upon CS-7's description of "Sean" LNU and his residence, your affiant believes that CS-7 was referring to Sean MAIDLOW.



CS-7 stated that the first time he dealt with "Sean" he was "fronted" one (1) pound of methamphetamine. CS-7 stated that he dealt with "Sean" a couple of more times after that. CS-7 stated that he received approximately six (6) total pounds of methamphetamine from "Sean". CS-7 stated that he paid "Sean" \$8,500.00 to \$9,000.00 per pound.

CS-7 advised that WEIR also introduced him to J.R. Ratcliff. Ratcliff advised CS-7 that he could do better on the price of methamphetamine than "Sean". Ratcliff offered to sell CS-7 a pound of methamphetamine for \$8,000.00. CS-7 stated that he bought methamphetamine from Ratcliff approximately five (5) times and purchased ½ to one (1) pound of methamphetamine each time.

CS-7 stated that Ratcliff and "Sean" were getting their methamphetamine from the same source in California. CS-7 stated that he believed that the source sent his "buddy" to our area and that he was living in Bristol, Virginia. CS-7 described the guy as being "sickly" or having cancer (based on the description, it is believed that CS-7 was referring to Shawn FARRIS).

According to the records of NCIC, Sean Philip MAIDLOW was convicted of two (2) separate charges of Possession of a Controlled Substance in 2015. Also in 2015 was a third arrest for Possession of a Controlled Substance (no disposition).

**Jair Medina GUTIERREZ, aka "*Primo*"**

On September 14, 2017, a controlled purchase of approximately one (1) pound of methamphetamine was made from Jair GUTIERREZ in Pomona, California for \$2,400.00. During the transaction, which lasted approximately 20 minutes, GUTIERREZ made the following statements to the CS:

GUTIERREZ advised the CS that he received fifteen (15) pounds of methamphetamine every two (2) weeks from a source of supply in Orange County, California. GUTIERREZ advised the CS that he paid for the fifteen (15) pounds of methamphetamine when he picked it up in full. GUTIERREZ advised the CS he would lower the price of the methamphetamine to \$2,100.00 per pound if the CS would purchase the methamphetamine in bulk. GUTIERREZ told the CS that he could supply the CS with Cocaine for \$21,000.00 per kilogram, and GUTIERREZ also had access to oxycodone and synthetic heroin pills that sell for \$14.00 per pill. GUTIERREZ told the CS that if he was interested in the pills, the CS would have to purchase no less than 1,000 pills per order.

GUTIERREZ advised the CS that he shipped multi-pound quantities of methamphetamine to customers in Tennessee and other states out east via United Parcel Service (UPS). GUTIERREZ advised the CS that he charged his customer in Tennessee and others out east \$3,100.00 per pound. GUTIERREZ advised the CS that he had a guy who worked for UPS that generated the shipping labels for his narcotics packages and also sent the packages for him. GUTIERREZ advised that he also received the money from the sale of the narcotics via UPS as well. GUTIERREZ advised that his UPS contact picked up the packages of money from the UPS facility and delivered them to GUTIERREZ.

As the result of an investigation conducted by DEA Riverside (California), several telephone calls and text messages were captured between telephone numbers (423) 366-7544 (Sean MAIDLOW) and (909) 667-9085 (Jair GUTIERREZ, aka "*Primo*"). The following are text messages between the two:

**September 25, 2017**

MAIDLOW to GUTIERREZ, *"Can you send me some more Spanish-speaking books today or tomorrow"*

GUTIERREZ to MAIDLOW, *"Ima try today, but tomorrow latest.... I'm just missin 1 dictionary"*

MAIDLOW to GUTIERREZ, *"Ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW ordered methamphetamine (*"Spanish-speaking books"*) from Jair GUTIERREZ. I believe that GUTIERREZ told MAIDLOW that he would send it tomorrow at the latest.

On September 26, 2017, at the direction of law enforcement, CS-5 exchanged the following text messages with telephone number (423) 366-7544 (Sean MAIDLOW):

CS-5 to MAIDLOW, *"Yo are we gonna be good today? Wanted to see if I could make a few calls n get some things going or not"*

MAIDLOW to CS-5, *"Tomorrow I'll b good"*

CS-5 to MAIDLOW, *"Ok bro"*

On September 28, 2017, CS-5 (working for the 2<sup>nd</sup> Judicial District Drug Task Force and acting at their direction) met with Sean MAIDLOW at 1205 Florida Ave., Bristol, TN and received four (4) ounces of crystal methamphetamine.

On October 1, 2017, CS-5 met with MAIDLOW at 1205 Florida Ave., Bristol, TN and paid him \$2,600.00 OAF (Official Advanced Funds) for the four (4) ounces of crystal

methamphetamine obtained on September 28, 2017. MAIDLOW advised CS-5 that next time, the CS could have eight (8) ounces of methamphetamine for \$5,000.00.

As a result of the Riverside DEA investigation, the following telephone calls and text messages were captured between Sean MAIDLOW and Jair GUTIERREZ:

**October 2, 2017**

(Telephone Call)

GUTIERREZ asked MAIDLOW if he was done. MAIDLOW told GUTIERREZ that he was done, but it was too late to send it.

Both MAIDLOW and GUTIERREZ verified that they should send it to the same addresses. GUTIERREZ told MAIDLOW that they would both send it tomorrow.

Based on my training and experience, and my knowledge of this investigation, I believe that Jair GUTIERREZ inquired of Sean MAIDLOW if he was done selling the last methamphetamine that GUTIERREZ sent. I believe that MAIDLOW told GUTIERREZ that he was done selling it, but it was too late in the day to send him the money. I believe that GUTIERREZ agreed to send more methamphetamine the next day, and MAIDLOW agreed to send the drug proceeds to GUTIERREZ.

**October 3, 2017**

(Text Messages)

GUTIERREZ to MAIDLOW, "*Let me know when u do that plz*"

MAIDLOW to GUTIERREZ, "*Ok I will*"

GUTIERREZ to MAIDLOW, *"Thanks bro"*

MAIDLOW to GUTIERREZ, *"We good"*

GUTIERREZ to MAIDLOW, *"Thank u"*

GUTIERREZ to MAIDLOW, *"Be ready"*

MAIDLOW to GUTIERREZ, *"Be careful"*

GUTIERREZ to MAIDLOW, *"Same place?"*

MAIDLOW to GUTIERREZ, *"Yes"*

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW advised Jair GUTIERREZ when he sent the drug proceeds to GUTIERREZ (*"we good"*). I believe that GUTIERREZ told MAIDLOW to be ready to receive methamphetamine at the same address as before.

**October 4, 2017**

(Text Messages)

GUTIERREZ to MAIDLOW, *"Is in ur city be ready"*

MAIDLOW to GUTIERREZ, *"What time is it scheduled to be here"*

MAIDLOW to GUTIERREZ, *"8:30 or 10:30"*

GUTIERREZ to MAIDLOW, *"1030"*

MAIDLOW to GUTIERREZ, *"Okay"*



(Telephone call)

MAIDLOW advised GUTIERREZ that the quality received was really, really good. However, the amount was two (2) ounces short. MAIDLOW told GUTIERREZ that he only received 14 ounces and 11 grams.

GUTIERREZ told MAIDLOW that he had done it himself, put it on the scale and everything. GUTIERREZ stated that he started doing it himself now. GUTIERREZ told MAIDLOW that he was missing 1½. GUTIERREZ stated that he would take care of MAIDLOW.

GUTIERREZ asked MAIDLOW about the quality, and said that this was a new supplier. MAIDLOW said that it was very good. GUTIERREZ told MAIDLOW to know who he was working with and not to deal with new people. GUTIERREZ told MAIDLOW that once his customers got ahold of this, others would come.

MAIDLOW told GUTIERREZ that the last stuff had a weird taste. GUTIERREZ said not to worry, this new guy was the main guy. GUTIERREZ told MAIDLOW that he had 20 of those motherfuckers and they would be good for a minute.

Based on my training and experience, and my knowledge of this investigation, I believe that Sean MAIDLOW received methamphetamine from Jair GUTIERREZ, scheduled to be delivered at 10:30 a.m. on October 4, 2017. I believe that the methamphetamine was supposed to be one (1) pound (16 ounces), however only weighted 14 ounces and 11 grams. I believe that GUTIERREZ agreed to make it up, and they talked about how the quality of this methamphetamine was better than the last. I believe that GUTIERREZ found a new source of supply for methamphetamine and had 20 pounds in his possession.

On October 4, 2017, acting at the direction of the 2<sup>nd</sup> DTF, CS-5 met with Sean MAIDLOW at 1101 Broad St., Bristol, TN and received approximately eight (8) ounces of crystal methamphetamine.

On October 25, 2017, agents were conducting surveillance on a known drug house in Pomona, CA. Surveillance observed Jair GUTIERREZ arrive and park in front of the residence. GUTIERREZ was detained while leaving this residence, and eventually his vehicle was searched. The following items were located and seized from GUTIERREZ' vehicle: approximately 2,724 grams of methamphetamine, five (5) firearms, miscellaneous firearm magazines, and miscellaneous ammunition.

On October 27, 2017, officers from Immigration and Customs Enforcement (ICE) and Customs and Border Control (CPB) executed a search warrant at the home of Jair GUTIERREZ. As a result of the search, approximately 298.4 grams of methamphetamine, 156.1 grams of heroin, 312 grams of marijuana and \$16,400.00 in United States currency was seized.

According to the records of NCIC, Jair GUTIERREZ has no prior drug felonies.

### **Lacey Cheri WEIR**

On June 4, 2016, a search warrant was executed at 119 Honaker Dr., Bristol, TN, the residence of James Mullins. Seized pursuant to the search warrant were the following: small amount of crystal methamphetamine, three (3) sets of digital scales, plastic baggies, drug paraphernalia, four (4) cellular telephones and \$1,465.00 U.S. Currency.

A search of the cellular telephones revealed the following text messages:

**June 2, 2016**

(423) 646-0505 (James Mullins) to (423) 544-1581 (Lacey WEIR), *"You didn't do the whole thing up did you do like a hundred twenty bucks what do you have left just be honest with me you know we're friends I don't want to cut you off like I did some more but I mean I can handle no more losses lately..."*

WEIR to Mullins, *"...I had 45 dollars but of course I didn't hang on to it..."*

Mullins to WEIR, *"So what do you have...please tell me you didn't lose the whole f\*\*\*\*\* 120"*

WEIR to Mullins, *"No I sold half of that gram and then I'm waiting on Maggie still"*

Mullins to WEIR, *"So if u list the 45 u still got half that g left right?"*

WEIR to Mullins, *"Come on you know I had to smoke something out of that. But don't worry you will get your money I wouldn't fuck you like that I promise Jamie have some faith in me"*

Based on my training and experience, and my knowledge of this investigation, I believe that James Mullins attempted to collect a drug debt from Lacey WEIR. I believe that WEIR was supposed to sell a gram of crystal methamphetamine for \$120.00, but she only had \$45.00, was waiting on Maggie to pay her, and had used some of it.

**June 3, 2016**

(423) 544-1581 (Lacey WEIR) to Mullins, *"Can you please get ahold of Mike he has been waiting on you and he always has your money"*

WEIR to Mullins, *"I got 50 more dollars"*

Mullins to WEIR, *"We need find a way make this other thing happen he spends like 29 to 25 g ever 3 daays"*

WEIR to Mullins, *"You should come by here and smoke with me"*

Mullins to WEIR, *"U got a tool??"*

WEIR to Mullins, *"Yea"*

Based on my training and experience, and my knowledge of this investigation, I believe that Lacey WEIR contacted James Mullins to advise him that Michael Misner ("*Mike*") had drug proceeds to pay to Mullins. I believe that Mullins told WEIR that he knew of someone that spent between \$25,000.00 and \$29,000.00 every three (3) days and they needed to find a way to get involved with him. I believe that WEIR invited Mullins to come to her place and smoke methamphetamine.

On November 17, 2016, CS-32 was interviewed by law enforcement. During the interview CS-32 provided information regarding his knowledge of the drug trade in Northeast, TN and Southwest, VA. CS-32 stated that Lacy WEIR was dating John Ratcliff. CS-32 stated that WEIR advised him that Ratcliff had a crystal methamphetamine connection in California. CS-32 stated that WEIR would drive to California and bring back about four (4) ounces of methamphetamine. CS-32 advised that in September of 2016, "*Dee Dee*" (Ratcliff's sister, Crystal Pharis) had to go to California and get WEIR. CS-32 stated that on the return trip, WEIR and "*Dee Dee*" brought back "ice" methamphetamine.

On April 12, 2017, CS-33 was interviewed by law enforcement. During the interview CS-33 advised that "*Cali girl*" came to Bristol each week with two (2) kilograms of methamphetamine, which cost \$14,000.00 per kilo. CS-33 was shown a picture of Lacy WEIR and identified WEIR as the person he referred to as "*Cali girl*".

On January 26, 2017, CS-17 was interviewed in Johnson City, TN. CS-17 stated that Joe Sholtz was a major methamphetamine importer into Northeast Tennessee and Southwest Virginia. CS-17 advised that at the time of the interview Lacey WEIR was obtaining her methamphetamine from Sholtz.

On February 3, 2017, David Estep, Jr. (subsequently indicted in the Eastern District of Tennessee in a related conspiracy) was interviewed by law enforcement following his arrest for possession of methamphetamine. Estep stated that he met John Ratcliff through Ratcliff's sister, Crystal Pharis. Estep advised that Ratcliff had been purchasing a lot of weight in methamphetamine from Lacy WEIR. Estep advised that WEIR was having methamphetamine shipped to her from an unknown location in California.

On July 12, 2017, Anthony HARLESS was interviewed by law enforcement regarding his knowledge of drug trafficking in Northeast Tennessee and Southwest Virginia. HARLESS stated that he had known Lacy WEIR for approximately three (3) years. HARLESS advised that WEIR was from California. HARLESS stated that WEIR introduced him to her uncle, Shawn FARRIS, who was bringing in a few pounds of methamphetamine at a time from California. HARLESS advised that he had purchased three (3) ounces of methamphetamine from FARRIS, through WEIR. WEIR also vouched for HARLESS so that he could go to FARRIS directly and obtain methamphetamine.

On October 30, 2017, CS-3 was interviewed by law enforcement regarding her knowledge of methamphetamine trafficking in Northeast Tennessee and Southwest Virginia. CS-3 stated that Shawn FARRIS was the methamphetamine source of supply who was bringing in all the methamphetamine to the area. CS-3 named another source of methamphetamine named "Sean" who lived on Windsor Avenue, Bristol, TN. CS-3 advised that she had obtained methamphetamine from "Sean", who was somehow related to Lacy WEIR. CS-3 advised that WEIR had connections to both FARRIS and "Sean". CS-3 stated that WEIR was the reason FARRIS and "Sean" came to the area from California. (Based on your affiant's knowledge of



this investigation, your affiant believes that "Sean" is Sean MAIDLOW who lived near Windsor Ave. in Bristol, TN.)

On February 2, 2018, CS-7 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Greeneville, TN. CS-7 stated that he was introduced to Lacey WEIR around the time of the search of his residence in June 2016. CS-7 advised that when he first met WEIR she gave him a couple "8 balls" (1/8 ounce each) of methamphetamine to sell. CS-7 advised that WEIR was more of a contact for bringing people together for the act of distributing methamphetamine. CS-7 further advised that WEIR knows all the "Cali" (California) boys.

CS-7 advised that in September or October 2016, WEIR introduced him to "Sean" who lived on Windsor Avenue in Bristol, TN. CS-7 stated that WEIR was supposedly selling methamphetamine for "Sean". CS-7 stated that "Sean" was getting his methamphetamine shipped to him from the United States Postal Service. CS-7 stated that he had observed a box that contained twenty (20) pounds or more of methamphetamine. CS-7 stated that "Sean" fronted one (1) pound of methamphetamine to him. CS-7 stated that over the next few months, CS-7 received a total of six (6) pounds of methamphetamine from "Sean". CS-7 stated that he paid "Sean" \$8,500 - \$9,500 per pound. (Based on your affiant's knowledge of this investigation, your affiant believes that "Sean" is Sean Maidlow)

CS-7 advised that later, WEIR introduced him to "J.R." Ratcliff. CS-7 stated that Ratcliff told him that he could do better on the price that "Sean" had been doing. CS-7 stated that Ratcliff told him that he could sell him one (1) pound of methamphetamine for \$8,000.00. CS-7

advised that he obtained methamphetamine from Ratcliff five (5) times and received ½ to one (1) pound each time.

CS-7 stated that WEIR advised him that Ratcliff and “Sean” were obtaining methamphetamine from the same source of supply in California. CS-7 believed that the California source sent one of his buddy’s to the area, who lived on the Virginia side of Bristol. CS-7 advised that the buddy looked like he was sick and may have had cancer. CS-7 advised that WEIR had introduced several people to this “buddy” for the purpose of selling methamphetamine. Based on my knowledge of this investigation, I believe this “buddy” was Shawn FARRIS.

According to the records of NCIC, Lacey WEIR was arrested in 2009 for Possession of a Controlled Substance for Sale and Possession of a Firearm by a Convicted Person. In 2012, WEIR was convicted of Possession of a Controlled Substance. In 2013, WEIR was convicted of Possession of a Controlled Substance. In 2015, WEIR was convicted of Possession of a Controlled Substance.

**Andrea Nichole STICKEL, aka “Nikki”**

On August 22, 2016, Bill Taylor (subsequently indicted in the Eastern District of Tennessee in a related conspiracy) was interviewed following his arrest for possession of methamphetamine and a gun. Taylor stated that “Nikki” STICKEL lived on Georgia Avenue and at the time was selling large amounts of methamphetamine. Taylor stated that STICKEL was dating “Jamie” JOHNSON who was also selling methamphetamine. Taylor stated that a possible source of supply for STICKEL was Joe Trantum (deceased).

On February 3, 2017, David Estep, Jr. (subsequently indicted in the Eastern District of Tennessee in a related conspiracy) was interviewed pursuant to his arrest for possession of methamphetamine. Estep stated that John Ratcliff was obtaining large amounts of methamphetamine from Lacy WEIR. Estep stated that WEIR was having the methamphetamine shipped to her from an unknown source in California. Estep advised that "*Nikki*" STICKEL was a methamphetamine customer of Ratcliff.

According to the records of Verizon Wireless, telephone number (276) 274-7314 was resold to TracFone Wireless. According to the records of TracFone Wireless, there was no name associated with the account, however, the date of birth of 4/30/1976 and an email address of [nikkistickel@gmail.com](mailto:nikkistickel@gmail.com) was used to procure the account. According to the records of NCIC, Andrea Nichole STICKEL has a date of birth of 4/30/1976.

On June 29, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 591-7287 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from June 20 to June 29, 2017. The following is an excerpt from the search warrant results:

**June 20, 2017**

Shawn Farris to (276) 274-7314 ("*Nikki*" STICKEL), "*Nicky I'm home call me*"

Based on my training and experience, and my knowledge of this investigation, I believe that Shawn Farris contacted "*Nikki*" STICKEL and instructed her to call him.

**June 21, 2017**

Shawn Farris to (276) 274-7314 ("*Nikki*" STICKEL), "*Come around to back door please*"

Based on my training and experience, and my knowledge of this investigation, I believe that Shawn Farris contacted “*Nikki*” STICKEL and instructed her to come to the back door at his house, possibly to pick up methamphetamine.

On August 16, 2017, James Nicholas “*Nick*” HOWINGTON was interviewed in Abingdon, VA. HOWINGTON stated that Shawn LNU (subsequently identified as Shawn FARRIS) was his supplier of methamphetamine and heroin. HOWINGTON stated that Shawn LNU was from California, but was staying in a brick house located near Virginia High School in Bristol, VA. HOWINGTON stated that “*Nikki*” STICKEL was his girlfriend and was also supplied methamphetamine by Shawn LNU. HOWINGTON stated that he and STICKEL kept their drug dealing separate.

HOWINGTON stated that he had been with STICKEL at the residence of Shawn LNU when she delivered drug proceeds to Shawn LNU. HOWINGTON stated that he had observed three (3) packages of methamphetamine, either pounds or kilograms, at the residence of Shawn LNU.

HOWINGTON stated that Shawn LNU was currently driving a charcoal colored Dodge Challenger that was registered in the name of “*Nikki*” STICKEL.

A search of HOWINGTON’s cellular telephone revealed telephone number (276) 274-7314 saved under the name “*Nikki*”. The following text messages were contained on the phone:

**January 21, 2017**

HOWINGTON to (276) 274-7314 (“*Nikki*” STICKEL), “*Honey I love you somuch I’ll throw a game and come back ok love u soo much*”

Based on my training and experience, and my knowledge of this investigation, I believe that Nick HOWINGTON advised "*Nikki*" STICKEL that he was going to sell 1/8 ounce of methamphetamine ("*throw a game*") and come back home.

**January 22, 2017**

(276) 274-7314 ("*Nikki*" STICKEL) to HOWINGTON, "*Hey honey. I'm going to finish off the rest of that so u may want to check back make sure clock still working! Lol*"

STICKEL to HOWINGTON, "*So far so good*"

HOWINGTON to STICKEL, "*Don't unroll I get home please*"

Based on my training and experience, and my knowledge of this investigation, I believe that "*Nikki*" STICKEL advised "*Nick*" HOWINGTON that she was going to use the remaining methamphetamine, and requested that he check on her later to make sure her heart was still pumping ("*clock still working*").

On October 30, 2017, CS-3 was interviewed by law enforcement. CS-3 stated that "*Nikki*" STICKEL was a methamphetamine distributor. CS-3 stated that she heard that STICKEL got packages in the mail worth approximately \$500,000.00. CS-3 advised that John Ratcliff was dealing with STICKEL.

On November 21, 2017, CS-10 was interviewed by law enforcement regarding her knowledge of drug trafficking in Northeast, TN and Southwest, VA. CS-10 stated that "*Jamie*" JOHNSON was a methamphetamine distributor. CS-10 stated that JOHNSON obtained his methamphetamine from "*Nikki*" STICKEL, which CS-10 had personally observed. CS-10 advised that she had purchased methamphetamine from JOHNSON on a couple of occasions, "8 ball" (1/8 ounce) quantities at a time. CS-10 stated that JOHNSON sold methamphetamine to Powell Earhart (subsequently indicted in the Eastern District of Tennessee in a related



conspiracy) to pay for rent. CS-10 stated that Earhart spent \$400.00 - \$500.00 a day on methamphetamine.

CS-10 stated that Christopher SMILEY ran around with JOHNSON. CS-10 stated that SMILEY also obtained methamphetamine from STICKEL, which he then distributed. CS-10 stated that SMILEY obtained heroin from "Nick" (HOWINGTON) that he distributed.

On December 1, 2017, Stephen GRAHAM was interviewed by law enforcement. GRAHAM advised that "Nikki" STICKEL had been his main source of supply for methamphetamine for the past two (2) years. GRAHAM advised that he started off by obtaining one (1) "8 ball" (1/8 ounce) of methamphetamine from STICKEL once a week for \$200.00. Eventually GRAHAM started to purchase 1/2 ounce quantities of methamphetamine from STICKEL, which continued to prior to his most recent arrest.

GRAHAM advised that he had seen a lot of methamphetamine during his dealing in the area. GRAHAM advised that he had seen approximately fifteen (15) ounces of methamphetamine at STICKEL's residence located on Georgia Avenue in Bristol, TN. GRAHAM advised that STICKEL lived at the Georgia Avenue residence with "Nick" HOWINGTON.

GRAHAM advised that STICKEL had a California source of supply for methamphetamine that lived in the area, but had moved back to California.

On January 19, 2018, Christopher SMILEY was interviewed by law enforcement. SMILEY advised that "Nikki" was a source of supply of methamphetamine for "Jamie" JOHNSON. Based on this investigation your affiant believes that Smiley was referring to Andrea Nichole "Nikki" STICKEL.

On February 22, 2018, officers with the Bristol, TN Police Department conducted a traffic stop on a vehicle that was being driven by Andrea Nichole "*Nikki*" STICKEL. During the usual course of the traffic stop a police K-9 conducted a free air sniff around the vehicle. The police K-9 alerted positively to the presence of narcotics being inside the vehicle.

Officers searched the vehicle and did not locate any illegal narcotics. However, officers found several items and circumstances that appeared odd. Officers located surveillance cameras, a server (computer), binoculars, police scanner, radar detector and three (3) cell phones. Officers also noted that there were several compartments inside the car that appeared to have been tampered with and they were loose.

On March 16, 2018, Darlene BARRETT was interviewed in Abingdon, VA following the execution of a search warrant at her residence. BARRETT stated that Shawn FARRIS was her source of supply for methamphetamine. BARRETT stated that Brad WILLIAMS also obtained methamphetamine from FARRIS. BARRETT stated that WILLIAMS had received six (6) pounds of methamphetamine from FARRIS. BARRETT stated that when WILLIAMS went to jail, he owed FARRIS \$28,000.00. BARRETT advised that her son Trey Barrett, along with Gary Childress, had stolen the drug proceeds from WILLIAMS' safe. BARRETT stated that FARRIS advised her that if he did not receive his money he would kill her son. BARRETT stated that she felt obligated to protect her son and pay the money back. BARRETT stated that she paid some of the money to FARRIS by mailing it to him. BARRETT stated that the last \$7,500.00, FARRIS directed her to meet "*Nikki*" STICKEL at the IHop restaurant at Exit 7 and give the money to her to send. BARRETT advised that she met STICKEL and before she could give her the money, an unknown male pulled up on a motorcycle and robbed the money from

her. BARRETT advised that she felt the robbery was a set up by STICKEL and the unknown male.

On May 15, 2018, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 274-7314 (Andrea Nichole STICKEL). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those account from May 3, 2018 to May 15, 2018. The following is an excerpt from the search warrant results:

**May 4, 2018**

STICKEL to (423) 637-2872, *"I wish u would've told me not to come if your not going to tell me where to go. Thanks."*

(423) 637-2872 to STICKEL, *"915 South Chillhowee Dr. Knox TN 37914"*

(423) 637-2872 to STICKEL, *"1625.00 for 4"*

Based on my training and experience, and my knowledge of this investigation, I believe that *"Nikki"* STICKEL made a trip to Knoxville, TN to obtain four (4) ounces of methamphetamine for \$1,625.00.

**May 7, 2018**

(276) 791-6721 (Shawn FARRIS) to STICKEL, *"I need a address Nikki"*

STICKEL to FARRIS, *"The one CV I sent you"*

STICKEL to FARRIS, *"Need your email"*

FARRIS to STICKEL, "Daddyshotspot1@gmail.com"

Based on my training and experience, and my knowledge of this investigation, I believe that Shawn FARRIS contacted "*Nikki*" STICKEL to obtain an address to which he could send methamphetamine.

On July 11, 2018, Andrea Nichole STICKEL was arrested in Sullivan County, TN following a vehicle pursuit. STICKEL was arrested in possession of approximately 56 grams of crystal methamphetamine, marijuana, drug paraphernalia, two (2) cellular telephones and over \$6,000.00 U.S. Currency.

According to the records of NCIC, Andrea Nichole STICKEL was arrested by the Drug Task Force in Johnson City, TN and charged with Violation of Parole in 2004.

**James Nicholas HOWINGTON, aka "*Nick*"**

On January 29, 2017, a traffic stop was conducted in Bristol, TN on a gray 2005 GMC pickup truck, operated by James Nicholas "*Nick*" HOWINGTON. HOWINGTON was found to have an outstanding arrest warrant from Johnson City and was subsequently placed under arrest. While searching HOWINGTON incident to arrest, a sum of United States currency was found, divided into two (2) stacks. The officer also noted a faint odor of marijuana coming from the vehicle.

Prior to searching HOWINGTON, and while waiting on confirmation of the warrant, a BTPD K-9 officer was called to the scene. The K-9 conducted a free air sniff around the 2005 GMC and the K-9 officer advised that the K-9 alerted to the affirmative that narcotics were in the vehicle.

Officers then conducted a search of the vehicle. A black bag was found inside the vehicle that contained several syringes, unused plastic bags, digital scales, spoon with residue, a bag containing a substance consistent with methamphetamine, two (2) bags with a substance consistent with heroin, one and a half (1½) pills identified as Subutex (Buprenorphine) and one (1) unidentified white pill.

The crystalline substance was analyzed by the Tennessee Bureau of Investigation (Knoxville) and was found to be 14.03 grams of methamphetamine. The suspected Subutex was analyzed by the Tennessee Bureau of Investigation (Knoxville) and found to be Buprenorphine. The suspected heroin was analyzed by the Tennessee Bureau of Investigation (Knoxville) and found to be 2.50 grams of Furanyl fentanyl.

Following the January 29, 2017 arrest of HOWINGTON, a search warrant was applied for and obtained to analyze the content of HOWINGTON's cellular telephone (423-612-6898). The following text messages are an excerpt from that analysis:

**January 28, 2017**

(423) 946-8963 (Greg KESTNER) to HOWINGTON, *"Hey can you show me how to cut the stuff with MSN the guy I got the bullets from I was paying him with some stuff"*

HOWINGTON to KESTNER, *"Yea I can you can just come over here in just a little bit"*

HOWINGTON to KESTNER, *"Prob around 430 5 that cool"*

KESTNER to HOWINGTON, *"Ya"*

Based on my training and experience and knowledge of this investigation, I believe that Greg KESTNER contacted "*Nick*" HOWINGTON and asked HOWINGTON how to "cut" (mixing methamphetamine with a substance that has the same physical characteristics as



methamphetamine) methamphetamine with MSM, *"Hey can you show me how to cut the stuff with MSN the guy I got the bullets from I was paying him with some stuff"*. I believe that HOWINGTON agreed to show KESTNER how to cut methamphetamine and invited him over. Your affiant is aware that MSM is a horse vitamin and a popular "cut" for methamphetamine.

On April 17, 2017, a Confidential Source (CS) working with the 2<sup>nd</sup> Judicial Drug Task Force (DTF) agreed to make a controlled purchase of methamphetamine and heroin from James Nicholas *"Nick"* HOWINGTON.

The CS advised agents that he/she had been on contact with HOWINGTON via Facebook. The CS advised that HOWINGTON asked how much money he/she had and he/she advised him that they had \$350.00 for methamphetamine and \$100.00 for heroin. HOWINGTON advised the CS that he was good and directed the CS to come to his house on Georgia Avenue in Bristol, TN.

The CS met with agents at a pre-arranged location. The CS was searched and no illegal contraband was found. The CS was given \$450.00 of pre-recorded United States currency and was equipped with audio and video recording devices. The CS was then driven to Georgia Avenue by an agent acting in an undercover capacity.

The CS and UC parked in an alley behind the residence and after a short time the CS went to HOWINGTON's back door and made contact with him. HOWINGTON advised the CS that he would be out in a few minutes. A few minutes later, HOWINGTON exited the residence and came to the UC vehicle and met with the CS. The CS gave HOWINGTON the \$450.00 and in return received two (2) clear plastic bags, one containing what appeared to be methamphetamine and one heroin.

The UC and CS then drove back to a staging location. The drugs were turned over to law enforcement for safekeeping. The CS was again searched for contraband and none was found. The drugs were submitted to the Tennessee Bureau of Investigation for analysis. On August 17, 2017 agents received the results of the analysis. Item 1 was found to be 6.93 grams of methamphetamine and item 2 was found to have no controlled substance.

On April 20, 2017, a Confidential Source (CS) working with the 2<sup>nd</sup> DTF agreed to make a controlled purchase of methamphetamine and heroin from "*Nick*" HOWINGTON. The CS advised that he/she had contacted HOWINGTON via Facebook and arranged to purchase \$350.00 (1/8 ounce) of methamphetamine and \$200.00 (1 gram) of heroin.

The CS met with agents and was searched and no illegal substances or money was found. The CS was given \$550.00 of pre-recorded United States currency for the deal and was outfitted with audio and video recording devices. HOWINGTON had directed the CS to come to his residence located at 901 Georgia Ave., Bristol, TN. A UC drove the CS to Georgia Avenue. While in route, HOWINGTON contacted the CS via cellular telephone and advised the CS to meet him at 701 Florida Avenue, Bristol, TN (parking lot of the First Presbyterian Church).

A short time later HOWINGTON arrived riding a motorcycle and the transaction took place. The CS gave HOWINGTON the \$550.00 and in return received a bag containing what appeared to be methamphetamine and a bag containing what appeared to be heroin. The CS and HOWINGTON engaged in a conversation wherein HOWINGTON advised the CS that a new shipment of methamphetamine was coming in from California. HOWINGTON told the CS that he would be sure to give the CS a big shard the next time.

Once the deal and conversation were completed, the UC and CS left the parking lot and traveled back to a staging location. The drugs were turned over to law enforcement for safekeeping and sent to the Tennessee Bureau of Investigation for analysis. On August 17, 2017, the results of the analysis were received. Item 1 was found to 7.45 grams of methamphetamine and item 2 was found to contain no controlled substances.

On May 4, 2017, a Confidential Source (CS) working with the 2<sup>nd</sup> DTF agreed to make a controlled purchase of methamphetamine and heroin from Nick HOWINGTON. The CS advised that he/she arranged to make the purchase at HOWINGTON's residence located at 901 Georgia Avenue, Bristol, TN, via cellular telephone.

The CS and agents met at a staging location. The CS was searched and no illegal substances or money were found. The CS was given \$550.00 of pre-recorded United States currency and was outfitted with an audio and video recording device. A UC drove the CS to 901 Georgia Avenue and after waiting and a phone call from HOWINGTON, he came out of the residence and met the CS. The CS gave HOWINGTON the \$550.00 and in return received a bag containing what appeared to be methamphetamine and a bag containing what appeared to be heroin.

Once the transaction was completed the CS and UC traveled back to a staging location. The drugs were turned over to agents for safekeeping and analysis. The drugs were sent to the Tennessee Bureau of Investigation for analysis. Item 1 was found to be 7.31 grams of methamphetamine and item 2 was found to contain no controlled substance.

On May 18, 2017, a search warrant was applied for and obtained in the Eastern District of Tennessee for text message content stored in the accounts of telephone number (423) 612-6898

(James Nicholas HOWINGTON). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from May 5 to May 18, 2017.

The following is an excerpt from the search warrant results:

**May 7, 2017**

(423) 797-0103 ("Jamey Juice") to HOWINGTON, *"Hey bro I think I just found something in room you might want"*

HOWINGTON to Jamey Juice, *"Whats up"*

Jamey Juice to HOWINGTON, *"IDK what it is but it has a line through it dude must have dropped it when he was here today"*

HOWINGTON to Jamey Juice, *"What numbers on it"*

Jamey Juice to HOWINGTON, *"I cant read it its thin white and round I will try and look it up"*

Jamey Juice to HOWINGTON, *"271"*

Jamey Juice to HOWINGTON, *"Myland 27 maybe"*

Jamey Juice to HOWINGTON, *"Diazepam"*

Jamey Juice to HOWINGTON, *"Whatever that is"*

Based on my training and experience, and my knowledge of this investigation, I believe that "Jamey Juice" contacted "Nick" HOWINGTON and advised HOWINGTON that he had found a Diazepam pill and that he would bring it to him later.

**May 12, 2017**

CS to HOWINGTON, *"Yo can I get a cutie of the blizzard and a g of the naughty brown girl"*

HOWINGTON to CS, *"Yea"*

CS to HOWINGTON, *"Can you help me out on that"*

HOWINGTON to CS, *"What u mean"*

CS to HOWINGTON, *"With what I usually get"*

HOWINGTON to CS, *"Yea"*

CS to HOWINGTON, *"Then me u be square"*

HOWINGTON to CS, *"Yea"*

CS to HOWINGTON, *"Cool I told u I would do wat I can do brother ole girl fucked me left me in a bind but least me and u square I call when I'm near"*

Based on my training and experience, and knowledge of this investigation I believe that the CS asked "Nick" HOWINGTON if he could provide him with one (1) ounce of methamphetamine and one (1) gram of heroin, (*"Yo can I get a cutie of the blizzard and a g of the naughty brown girl"*). I believe that HOWINGTON replied that he could, and the CS advised HOWINGTON that he would call him when he was close to him.

On May 12, 2017, a Confidential Source (CS), working with the 2<sup>nd</sup> DTF agreed to make a controlled purchase of ¼ ounce of methamphetamine and one (1) gram of heroin from James Nicholas "Nick" HOWINGTON. The deal was set up with HOWINGTON utilizing the text messaging service of the CS' phone and HOWINGTON's phone.

The CS met with agents and was given \$350.00 for the purchase of methamphetamine and \$200.00 for the purchase of the heroin. An undercover officer then drove the CS to HOWINGTON's residence, located at 901 Georgia Avenue, Bristol, TN.

Upon arrival the CS made contact with HOWINGTON via cellular telephone and HOWINGTON advised the CS to come to the back porch. The CS then met HOWINGTON on the porch and the transaction took place with the CS giving HOWINGTON \$550.00 and in



return receiving one (1) bag containing a rock like substance consistent with methamphetamine and one (1) bag containing a brown powder like substance consistent with heroin.

Once the transaction was completed, the UC and CS traveled back to a staging location. The drugs were turned over to agents for safekeeping and analysis.

On May 17, 2017, both drug items were sent to the Tennessee Bureau of Investigation Crime lab for analysis. On September 22, 2017, agents received the results of the analysis. Item 1 was found to be 7.21 grams of methamphetamine. Item 2 was found to be 1.26 grams of a substance containing no controlled substances.

**May 16, 2017**

CS to (423) 612-6898 (Nick HOWINGTON), *"Yo I'm here"*

CS to HOWINGTON, *"There in 2 sev"*

CS to HOWINGTON, *"Sec"*

CS to HOWINGTON, *"U want me to come to porch"*

Approximately 30 Minutes later the following texts were exchanged between the CS and HOWINGTON:

CS to HOWINGTON, *"Yo WTF that shit uncalled for I ain't taking this shit"*

HOWINGTON to CS, *"Your fucking crazy that is all good shit not touched"*

CS to HOWINGTON, *"That shit dissolve so fucking quick u might not but that shit cut to hell and back"*

HOWINGTON to CS, *"No its not it just came in like two hours ago and its not either"*

CS to HOWINGTON, *"I guess the next three weeks are going to suck for everybody then"*

HOWINGTON to CS, *"I think that's the best that's come in"*

CS to HOWINGTON, *"Man I know my shit I been in this get a lot longer then u...and that shit is more stepped on then before and my girl gave me a peace and if I'm complaining she is going to raise hell"*

HOWINGTON to "CS, *"I doubt it you had in your mind before you even showed up there was something going on and your just playing ion it don't fuck with me I don't have time for this shit either you want or you don't"*

CS to HOWINGTON, *"No its hit or miss w u and I been fucking w this shit back when was real shit...but when she get off I show u exactly wat I'm talking bout"*

Based on my training and experience, and my knowledge of this investigation, I believe that the CS utilized the text messaging service of his cellular telephone to contact James Nicholas "*Nick*" HOWINGTON via his cellular telephone. I believe that at the beginning of the conversation CS purchased methamphetamine from HOWINGTON. I believe that later in the conversation, CS complained to HOWINGTON that the quality of the methamphetamine was not good, (*"That shit dissolve so fucking quick u might not but that shit cut to hell and back"*).

On August 16, 2017, James Nicholas "*Nick*" HOWINGTON was interviewed in Abingdon, VA. HOWINGTON stated that he was addicted to drugs and used whatever was available to get a buzz. HOWINGTON advised that he preferred pills, but lately had been using heroin to chase that buzz. HOWINGTON stated that he sold methamphetamine, but did not like to use it.

HOWINGTON stated that his source of supply for methamphetamine and heroin was Shawn LNU who was from California. HOWINGTON stated that Shawn had moved to Bristol approximately one and a half (1½) years ago. HOWINGTON stated that Shawn lived in a brick house near Virginia High School (HOWINGTON provided direction and a description of the

residence located at 600 Garden Lane Bristol, VA). HOWINGTON stated that Shawn had a Hispanic girlfriend named Sophia LNU who came with him from California. (Based on HOWINGTON's description and your affiant's knowledge of this investigation, it is believed that HOWINGTON was referring to Shawn FARRIS and Alba Sophia Perez McMurray.)

HOWINGTON stated that Shawn drove a new charcoal colored Dodge Challenger that was registered to "Nikki" Stickel. HOWINGTON stated that Shawn put \$8,000 or \$10,000 down on the vehicle and planned to pay it off in two (2) months.

HOWINGTON stated that he was introduced to Shawn by John Ratcliff for the purpose of obtaining methamphetamine. HOWINGTON stated that he obtained twelve (12) ounces of methamphetamine from Shawn on two (2) separate occasions. On both occasions, Shawn provided heroin to HOWINGTON, ½ and 1½ ounces respectively. HOWINGTON told officers that he sold the methamphetamine and kept the heroin for his personal use. HOWINGTON stated that he may have sold a little bit of the heroin to help people out, but mainly just sold the methamphetamine.

HOWINGTON stated that Shawn received packages of methamphetamine through the United States Postal Service. HOWINGTON was present at Shawn's residence on one (1) occasion when a package arrived from Shawn to Sophia. HOWINGTON advised that Shawn was in Rancho Cucamonga, California at the time and sent the package to his own address in Virginia. HOWINGTON unpackaged the methamphetamine at Sophia's direction. HOWINGTON described the methamphetamine as being in three (3) heat sealed bags, either pounds or kilograms. HOWINGTON stated that Shawn received the same amount of methamphetamine every time. HOWINGTON stated that he did not receive any

methamphetamine at this time because he was there with "*Nikki*" STICKLE to leave drug proceeds for Shawn.

HOWINGTON advised that he paid Shawn \$500.00 per ounce of methamphetamine and resold ½ ounce quantities for \$550.00. HOWINGTON advised that his customers included Matt Able, Stephen GRAHAM and A.J. Edwards.

On November 21, 2017, CS-10 was interviewed by law enforcement regarding her knowledge of drug trafficking in Northeast, TN and Southwest, VA. CS-10 stated that Christopher SMILEY was an associate of "*Jamie*" JOHNSON. CS-10 stated that SMILEY sold methamphetamine that he obtained from "*Nikki*" STICKEL. CS-10 stated that SMILEY sold heroin that he obtained from "*Nick*" HOWINGTON.

On December 4, 2017, Stephen GRAHAM was interviewed by law enforcement regarding his knowledge of drug trafficking Northeast, TN and Southwest, VA. GRAHAM stated that two (2) years ago he started selling crystal methamphetamine that he obtained from "*Nikki*" STICKEL. GRAHAM stated that STICKEL and "*Nick*" HOWINGTON lived together and STICKEL had a source of methamphetamine from California. GRAHAM advised that HOWINGTON had been driving the California source's gold BMW and that STICKEL and HOWINGTON put the California source's property in storage for him. It is believed, by agents, that the California source referred to by GRAHAM was Shawn FARRIS.

On January 19, 2018, Christopher SMILEY was interviewed in Bristol, VA. SMILEY stated that "*Nick*" HOWINGTON was a source of supply of methamphetamine for "*Jamie*" JOHNSON. SMILEY stated that HOWINGTON was a source of supply for heroin to Matt Abel and "*Seven*". SMILEY stated that Abel sold the heroin to SMILEY because SMILEY was

unable to buy heroin directly from HOWINGTON. SMILEY stated that he obtained heroin in this manner ten (10) to fifteen (15) times.

On March 6, 2018, Joshua CHAPMAN was interviewed in Sullivan County, TN. CHAPMAN stated that he had used "*Nick*" HOWINGTON and his girlfriend, "*Nikki*" (STICKEL), as a "plug" (source for drugs). CHAPMAN further advised that HOWINGTON sometimes met a black male at the Speedway Inn to possibly deal dope.

According to the records of NCIC, James Nicholas HOWINGTON was arrested in 2011 for Possession of Drugs and Unlawful Drug Paraphernalia. In 2017, HOWINGTON was arrested for Possession of Methamphetamine, Possession of Heroin with the Intent for Resale, Maintaining a Dwelling Where Drugs are Sold and Simple Possession.

**James Robert JOHNSON, aka "*Jamie*"**

On March 29, 2016, CS-26 was interviewed by law enforcement regarding his knowledge of drug trafficking in Northeast Tennessee and Southwest Virginia. CS-26 stated that Suzan Greer obtained prescriptions for Suboxone from Doctor Brown's Office and "*Jamie*" JOHNSON paid for the appointments. CS-26 stated that JOHNSON received a portion of the Suboxone in exchange for paying for the doctor's appointments.

CS-26 stated that one (1) week prior to this interview, he went to a residence of a white male, whom he knew only as "*Buddy*", and JOHNSON was there. CS-26 stated that JOHNSON had approximately three (3) ounces of clear methamphetamine in his possession. CS-26 advised that he used some of the methamphetamine.



CS-26 stated that since he had known JOHNSON he had purchased approximately twenty (20) grams of methamphetamine from JOHNSON for \$100.00 per gram.

On June 2, 2016, a traffic stop was conducted on a vehicle operated by Lawrence Powell Earhart in Bristol, TN. Also present in the vehicle were Larry Addair and Audriana Belcher. Earhart was eventually arrested for possession of methamphetamine (and subsequently indicted in the Eastern District of Tennessee in a related conspiracy). Pursuant to a search warrant, Earhart's cellular telephone was searched. Saved in the contacts list under "Jamie Johnson" was telephone number (423) 612-3245. Earhart's phone contained the following text messages with "Jamie Johnson":

**February 20, 2016**

Earhart to JOHNSON, *"You around man. How much on a large order ... You know the size I'm thinking... I Zeke wants to know"*

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart inquired of a price to purchase a large amount of methamphetamine ("*large order*") from "*Jamie*" JOHNSON.

**March 2, 2016**

Earhart to JOHNSON, *"...but should you be doing good little later this evening let me know, holding a spot for a friend and wonder how long to hold it. Thanks man."*

JOHNSON to Earhart, *"Yeah I'm good. Call me."*

Earhart to JOHNSON, *"Will do in few checking farm house now ... game and if any points I could use them lol"*

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart ordered 1/8 ounce of methamphetamine ("*game*") and any needles ("*points*") that "*Jamie*" JOHNSON had (for intravenous use of methamphetamine).

**March 4, 2016**

Earhart to JOHNSON, "...*also got somebody game, so keep that in mind if you would... no big hurry as there weekend does not start till tonight. Thanks man.*"

JOHNSON to Earhart, "*Your good. Bout an hour*"

Earhart to JOHNSON, "*K... thanks man*"

JOHNSON to Earhart, "*Quick as I can*"

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart ordered 1/8 ounce of methamphetamine ("*game*"), to which "*Jamie*" JOHNSON replied he could meet in an hour.

**March 7, 2016**

Earhart to JOHNSON, "*Got a friend asking. Was wondering if you are about this evening*"

Earhart to JOHNSON, "*I could possibly meet somewhere in a few*"

Earhart to JOHNSON, "*Any orange tips around*"

JOHNSON to Earhart, "*Sorry man. I've been cooking supper. 701 Pennsylvania Ave. where I'll be. More than welcome to drop by.*"

Earhart to JOHNSON, *"Yeah man think I'll take you up on it. Phones blowing up"*

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart inquired of "*Jamie*" JOHNSON if he had methamphetamine for sale ("*wondering if you are about this evening*") as well as needles ("*orange tips*"). I believe that JOHNSON replied in the affirmative and told Earhart to drop by the residence of "*Nikki*" Stickel at 701 Pennsylvania Ave., Bristol, TN.

**March 9, 2016**

Earhart to JOHNSON, *"What's up man, got a friend coming later, wondering if you might be out and about tonight... just let me know"*

JOHNSON to Earhart, *"Sure will. I'll bring the trailer with this evening"*

Earhart to JOHNSON, *"Good deal, be great if we could talk some points of our conversation on Big Orange football the other night... oh those vols lol"*

JOHNSON to Earhart, *"Anything for vols fan!"*

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart inquired of "*Jamie*" JOHNSON if he had methamphetamine for sale ("*be out and about tonight*"). I believe that JOHNSON replied in the affirmative. I believe that Earhart then ordered more needles for which to use the methamphetamine ("*talk some points on Big Orange football*").

**March 18, 2016**

Earhart to JOHNSON, *"If you are out and about and doing good I hope you might swing by, and I'd like to get a couple of those orange tip flower bulbs so I might plant a few in the coming days... spring is in the air."*

JOHNSON to Earhart, *"Indeed it is. I'll see what I can do"*

Earhart to JOHNSON, *"No huge deal on the bulb flowers, I'll get done another time if not good this time around, but still game on for me brother"*

JOHNSON to Earhart, *"10-4"*

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart inquired if "*Jamie*" JOHNSON had methamphetamine for sale ("*out and about and doing good*") and requested additional needles to use the methamphetamine ("*orange tip flower bulbs*").

#### **March 28, 2016**

Earhart to JOHNSON, *"...Give me a ring when you get up bro, like to get a game going at some point. Maybe sit and shoot the shit awhile. Talk tomorrow."*

JOHNSON to Earhart, *"I'll come by and chat tomorrow. I bid you goodnight until then"*

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart ordered 1/8 ounce of methamphetamine ("*game*") from "*Jamie*" JOHNSON.

#### **April 11, 2016**

Earhart to JOHNSON, *"Hey man, having a good day? So we had a blast on the court last night, I have the fees for last night by the way, also would like to reserve space*

*tonight, if available. Give a holler and let me know what's the deal... I can roll your way if need be, coming your way anyway"*

JOHNSON to Earhart, *"Call me when you can"*

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart told *"Jamie"* JOHNSON that he had money to pay to JOHNSON for the methamphetamine from the previous night (*"I have the fees for last night"*), and asked if he could obtain additional methamphetamine tonight (*"reserve space tonight"*).

**May 5, 2016**

Earhart to JOHNSON, *"Going to stop at bank if you have any tickets for that game"*

JOHNSON to Earhart, *"10-4"*

Earhart to JOHNSON, *"Almost home see you there bro"*

JOHNSON to Earhart, *"On my way"*

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart ordered 1/8 ounce of methamphetamine (*"game"*) from *"Jamie"* JOHNSON, who replied that he had it (*"10-4"*).

**May 28, 2016**

Earhart to JOHNSON, *"You around man"*

JOHNSON to Earhart, *"Yeah"*

Earhart to JOHNSON, *"Doing good"*



JOHNSON to Earhart, "*Yeah. Come by if you want*"

Earhart to JOHNSON, "*Ok, see you soon*"

Based on my training and experience, and my knowledge of this investigation, I believe that Powell Earhart asked "*Jamie*" JOHNSON if he had any methamphetamine ("*doing good*"), and JOHNSON replied that he did and for Earhart to come get it.

On August 22, 2016, Bill Taylor (subsequently indicted in the Eastern District of Tennessee in a related conspiracy) was interviewed following his arrest for possession of methamphetamine and a gun. Taylor stated that "*Nikki*" STICKEL lived on Georgia Avenue and at the time was selling large amounts of methamphetamine. Taylor stated that STICKEL was dating "*Jamie*" JOHNSON who was also selling methamphetamine. Taylor stated that a possible source of supply for STICKEL was Joe Trantum (deceased).

On March 23, 2017, CS-27 was interviewed by law enforcement. CS-27 advised that ten (10) years ago he was a distributor of crack cocaine. CS-27 advised that for the past two (2) years he has been selling methamphetamine. CS-27 advised that he started out being supplied methamphetamine by "*Jamie*" JOHNSON in the area of Hickory Tree (Bristol, TN). CS-27 advised that JOHNSON was supplied methamphetamine a female who stayed in the tree street area (Bristol, TN), maybe Spruce or Pine Street. CS-27 advised that the house may have belonged to "*J.R.*" (John Ratcliff) and that "*Dee Dee*" (Crystal Pharis) used to stay at this house. CS-27 stated that he had purchased methamphetamine from this house, usually ¼ to one (1) ounce at a time. (Your affiant believes that the female referred to as JOHNSON's source of supply was Andrea Nichole "*Nikki*" STICKEL, whose residence at the time was 701

Pennsylvania Ave., Bristol, TN, across the street from the family residence of John Ratcliff and Crystal Pharis.)

On September 28, 2017, a traffic stop was conducted in Bristol, TN on a vehicle operated by Teryn FELTY. The officer issued FELTY a citation for a tag light being out and gave her things back to her and completed the stop. The officer then asked FELTY if there was anything illegal inside the vehicle and FELTY advised, no. The officer then asked FELTY for consent to search the vehicle. The officer noted that FELTY became nervous as if she was concealing something. The officer then explained to FELTY that he had observed her leaving a high narcotics area and asked her what she was concealing in the vehicle. At this time FELTY presented the officer with a bag that contained what FELTY stated was twelve (12) grams of methamphetamine. The officer asked FELTY to step out of the vehicle and at this time she presented the officer with an additional bag of methamphetamine that she removed from her bra area. FELTY voluntarily stated that she had just purchased the methamphetamine from "*Jamie*" JOHNSON at the white house on Earhart Rd.

On November 21, 2017, CS-10 was interviewed by law enforcement regarding her knowledge of drug trafficking in Northeast Tennessee and Southwest Virginia. CS-10 stated that "*Jamie*" JOHNSON was a methamphetamine distributor. CS-10 further explained that JOHNSON obtained his methamphetamine from "*Nikki*" STICKEL and CS-10 had personally observed JOHNSON obtain methamphetamine from STICKEL. CS-10 advised that she had bought methamphetamine from JOHNSON a couple of times, "8 ball" (1/8 ounce) amounts. CS-10 also advised that JOHNSON sold methamphetamine to Powell Earhart to pay for rent. CS-10 advised that Earhart spent \$400.00 to \$500.00 a day on methamphetamine.

On January 19, 2018, Christopher SMILEY was interviewed in Bristol, VA. SMILEY stated that "*Jamie*" JOHNSON lived in a small house on the property of Powell Earhart. SMILEY stated that JOHNSON had supplied methamphetamine to him on several occasions since August 2017. SMILEY advised that JOHNSON sold methamphetamine for \$600.00 to \$700.00 per ounce and he had bought from JOHNSON on approximately twenty (20) occasions.

On February 3, 2018, while on routine patrol Officer Chesney Roark of the Bristol, TN Police Department observed a gold Mazda sedan with Tennessee registration 4G8-1G9, registered to James R. JOHNSON, at the residence located at 901 Georgia Avenue, Bristol, TN. Officer Roark was familiar with the residents of this address, Andrea Nichole "*Nikki*" STICKEL and James Nicholas "*Nick*" HOWINGTON, as drug distributors.

According to the records of NCIC, James Robert JOHNSON had no prior drug felonies.

### **Stephen Anthony GRAHAM**

On May 18, 2017, a search warrant was applied for and obtained in the Eastern District of Tennessee for text message content stored in the accounts of telephone number (423) 612-6898 (James Nicholas HOWINGTON). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from May 5 to May 18, 2017. The following is an excerpt from the search warrant results:

**May 11, 2017**

(276) 285-7818 (Stephen GRAHAM) to HOWINGTON, "*I haven't been doin anything*"

GRAHAM to HOWINGTON, "*I think I can help*"

GRAHAM to HOWINGTON, "*Roach said he got 15s for 20*"

GRAHAM to HOWINGTON, *"Yea how many u want"*

GRAHAM to HOWINGTON, *"He said give him a jus a few"*

GRAHAM to HOWINGTON, *"U can come on an get me it won't be long"*

GRAHAM to HOWINGTON, *"He drop those here do u want them or no so I can tell him to come back and get em"*

GRAHAM to HOWINGTON, *"I'm at Eastern Little League field on Virginia side"*

GRAHAM to HOWINGTON, *"Do u want me to keep these for u or give them back to Roach"*

Based on my training and experience, and my knowledge of this investigation, I believe that Stephen GRAHAM contacted "Nick" HOWINGTON and agreed to obtain 15 mg dosage units of Roxicet (oxycodone) for \$20.00 each from "Roach". I believe that only one side of the conversation was captured by Verizon Wireless. I have been advised by Verizon Wireless that sometimes, due to the type of phone used, only one side of a conversation is captured and stored by their database.

On August 16, 2017, James Nicholas "Nick" HOWINGTON was interviewed in Abingdon, VA. HOWINGTON stated that he sold methamphetamine and heroin supplied by Shawn LNU (subsequently identified as Shawn FARRIS). HOWINGTON stated that his methamphetamine customers included Stephen GRAHAM and others. HOWINGTON stated that GRAHAM purchased ¼ ounces of methamphetamine at a time from HOWINGTON.

On December 1, 2017, Stephen GRAHAM was interviewed by law enforcement at the Sullivan County Sheriff's Office. GRAHAM stated that he had been selling "ice" (crystal

methamphetamine) for approximately two (2) years. GRAHAM stated that he obtained his methamphetamine through "Nikki" STICKEL. GRAHAM advised that in the beginning he obtained approximately one (1) "8 ball" (1/8 ounce) of methamphetamine per week for \$200.00. GRAHAM advised that this continued for about one (1) year before he began to get more weight from STICKEL. GRAHAM advised that eventually he started getting 1/2 ounces of methamphetamine at a time from STICKEL. GRAHAM stated that this went on regularly for a couple of months prior to his most recent arrest when he and STICKEL had a falling out. GRAHAM advised that they had a falling out over \$400.00 to \$500.00 that he owed to STICKEL. GRAHAM further advised that STICKEL had some unknown motorcycle guys that were threatening him over the money.

According to the records of NCIC, Stephen GRAHAM was convicted of Manufacturing, Sale, Possession of a Schedule I or II Controlled Substance. In 2011, GRAHAM was convicted of Conspiracy to Distribute Marijuana in the Eastern District of Tennessee. In 2013, GRAHAM's supervised release was revoked. In 2016, GRAHAM was convicted of Violation of Probation. In 2017, GRAHAM was charged with Possession of Methamphetamine.

### **Christopher Lee SMILEY**

On June 4, 2017, EMS was called to the residence of Lawrence Powell Earhart in Bluff City, TN due to a drug overdose. When the police arrived, Christopher SMILEY and a female were detained in a vehicle in the driveway. Pursuant to a search of the vehicle, drug paraphernalia and a cellular telephone were seized. SMILEY claimed that the cellular telephone was his. Contained within the phone were the following text messages:

**May 5, 2017**



(423) 723-4169 (Terry DALTON) to SMILEY, *"Hey did u call"*

SMILEY to DALTON, *"Seeibg what's going on"*

DALTON to SMILEY, *"Not much just trying to come up with 2 stacks"*

Based on my training and experience, and my knowledge of this investigation, I believe that Christopher SMILEY contacted Terry DALTON to obtain drugs. I believe that DALTON advised SMILEY that he was trying to collect \$2,000.00 (*"2 stacks"*).

**May 29, 2017**

(276) 254-2285 (*"Cornbred"*) to SMILEY, *"What's shakin baby"*

SMILEY to Cornbred, *"All good round here"*

Cornbred to SMILEY, *"I'm in Abingdon & need a half"*

SMILEY to Cornbred, *"How much cash do you have"*

Cornbred to SMILEY, *"I got 6 total"*

Based on my training and experience, and my knowledge of this investigation, I believe that *"Cornbred"* contacted Christopher SMILEY in and attempt to purchase ½ ounce of methamphetamine for \$600.00.

**May 31, 2017**

SMILEY to (423) 612-3245 (*"Jamie"* JOHNSON), *"In down at pit row"*

JOHNSON to SMILEY, *"Ok"*

JOHNSON to SMILEY, *"What's up"*

SMILEY to JOHNSON, *"I'm takibgnoff now"*

JOHNSON to SMILEY, *"You're right beside my house"*

(423) 557-3697 (Teryn FELTY) to SMILEY, *"Anything good?"*

SMILEY to FELTY, *"We got some fire dope and I've got a half oz of dank bud I need to sell"*

FELTY to SMILEY, *"I'm with Josh Chapman and that dude Josh that was with me at Sarah's. Is that okay? They my ride lol"*

SMILEY to FELTY, *"I can't have all of em come here but well be leaving here in a min we've gotta get some sells done today"*

FELTY to SMILEY, *"Okay well I need to grab something from you"*

Based on my training and experience, and my knowledge of this investigation, I believe that Christopher SMILEY met with Jamie JOHNSON to obtain methamphetamine. I believe that Teryn FELTY contacted SMILEY to obtain methamphetamine, and SMILEY advised her that he had methamphetamine (*"fire dope"*) and marijuana (*"dank bud"*).

**June 2, 2017**

(276) 494-8393 (Matt Able) to SMILEY, *"Hey bro this is Matt I was trying to locate half an onion. Any idea what u might do produce wise? I'd call but my phone fell in some water and I can only text til I get it fixed"*

Based on my training and experience, and my knowledge of this investigation, I believe that Matt Able contacted Christopher SMILEY in an attempt to purchase ½ ounce of methamphetamine (*"half an onion"*).

**June 4, 2017**

SMILEY to Terry DALTON, *"They found a broke needle, scales and 800 mg ibuprofen in my vehicle"*

Based on my training and experience, and my knowledge of this investigation, I believe that Christopher SMILEY advised Terry DALTON that the police found drug paraphernalia and 800 mg Ibuprofen as a result of a search conducted at the residence of Powell Earhardt.

On November 21, 2017, CS-10 was interviewed by law enforcement regarding her knowledge of drug trafficking in Northeast Tennessee and Southwest Virginia. CS-10 advised law enforcement that Christopher SMILEY was associated with *"Jamie"* JOHNSON. CS-10 advised that SMILEY obtained methamphetamine from *"Nikki"* STICKEL that he then distributed. SMILEY also obtained heroin from *"Nick"* (HOWINGTON) that he distributed.

On January 18, 2018, Christopher SMILEY was interviewed by law enforcement. SMILEY was advised of his Miranda Rights, advised he understood them and signed a waiver of the same. SMILEY advised that his drug of choice to use was opioids, but had used many different drugs. Most recently, SMILEY began using marijuana and heroin two (2) years ago and returned to the area of Southwest Virginia in February 2017.

SMILEY stated that prior to August 2017, SMILEY obtained one (1) ounce of methamphetamine at a time from Powell Earhart for \$800.00 to \$1000.00 each ounce. SMILEY

stated that he had purchased one (1) ounce of methamphetamine from Earhart on approximately ten (10) occasions. SMILEY stated that since August 2017, he obtained methamphetamine from "*Jamie*" JOHNSON who lived in a house on Earhart's property. SMILEY stated that he obtained one (1) ounce of methamphetamine for \$600.00 to \$700.00 on approximately twenty (20) occasions from JOHNSON.

SMILEY stated that he had obtained heroin from Matt Abel, who had received it from "*Nick*" HOWINGTON. SMILEY advised that he was not able to go directly to HOWINGTON to purchase the heroin. SMILEY obtained heroin in this manner ten to fifteen (10-15) times.

SMILEY advised that he sold methamphetamine in smaller amounts, but only made \$100.00 for every ounce of methamphetamine that he sold.

SMILEY stated that in October 2017, he was introduced to "*Fonda*" by Skyler (SEBASTIAN). SMILEY stated that "*Fonda*" supplied methamphetamine, heroin and cocaine to SMILEY. SMILEY stated that "*Fonda*" only charged SMILEY \$100.00 per ounce of methamphetamine. SMILEY advised that he had obtained approximately fifty (50) to sixty (60) ounces of methamphetamine from "*Fonda*" since October 2017.

SMILEY advised that he purchased heroin from "*Fonda*" for \$200.00 per gram and was able to resell the heroin for \$400.00 per gram. SMILEY stated that he had obtained approximately ten (10) grams of heroin per week from "*Fonda*" for three (3) to four (4) months.

"*Fonda*" was supplied heroin by an individual in Kingsport, Tennessee. "*Fonda*" took SMILEY to meet this heroin source last month (December 2017), and since then, SMILEY has obtained twenty (20) to thirty (30) grams of heroin directly from him, paying \$150.00 per gram.

SMILEY stated that he sold heroin to John Farner, aka "*Johnny Ratchet*" who lived near the lake (subsequently indicted in the Eastern District of Tennessee in a related conspiracy).

SMILEY listed several other heroin customers of his, including Barry Hall (aka "*Mohawk*", also indicted in Tennessee) and several people in Richlands, VA.

According to the records of NCIC, Christopher Lee SMILEY was arrested in 2017 for Distribution of a Schedule I or II Controlled Substance, Distribution of a Schedule III Controlled Substance, and Possession of a Firearm while in Possession of a Controlled Substance.

**Joshua Todd Chapman**

On September 25, 2016, officers with the Bristol, TN Police Department (BTPD) encountered Joshua CHAPMAN as the operator of a vehicle at a call for service at 202 Big Valley Drive Bristol, TN. The call was for a welfare check for a child in the residence. Upon arrival, officers noted a multi-colored Mazda SUV in the driveway.

The occupant of the residence advised she did not recognize the vehicle nor know the occupants, Joshua CHAPMAN and Ricky Bender. The owner of the residence requested that officers ask them to leave. A K-9 officer with BTPD arrived on scene to assist. Bender was asked to step from the vehicle and gave consent for his person to be searched and no illegal items were located. CHAPMAN was asked to step from the vehicle and when he did an orange bottle with a glass pipe used to smoke methamphetamine fell to the ground. CHAPMAN was searched without incident and no further items were found on his person.

The K-9 conducted a free air sniff around the vehicle and the K-9 alerted to the presence of narcotics in the vehicle. A revolver style handgun was found on the passenger side of the vehicle. A red bag that had been located on CHAPMAN'S lap was searched and inside were two (2) bags containing what appeared to be methamphetamine. Also, found was what appeared to be fifteen (15) Xanax pills. Ammunition for a .38 caliber gun was found along with Suboxone



and unidentified pills. CHAPMAN'S identification was also found in the bag. CHAPMAN was arrested at the scene.

On September 27, 2016, CS-34 was interviewed in Bristol, TN. CS-34 stated that during September 2017, Joshua CHAPMAN was supplied methamphetamine by Larry Addair (deceased). CS-34 advised that CHAPMAN received ounce quantities from Addair.

On April 19, 2017, CS-35 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Greeneville, TN. CS-35 stated that Brandon Thorpe had stolen his vehicle and had taken the vehicle to Knoxville, Tennessee. CS-35 stated that when Thorpe came back he took the vehicle to the residence of Paul Borrer in Bristol, TN. At the time Thorpe stole the vehicle, Joshua CHAPMAN was with him and CHAPMAN had a handgun on him. CS-35 stated that he had smoked methamphetamine with CHAPMAN at his apartment. CS-35 stated that CHAPMAN had provided methamphetamine to him for free.

On November 30, 2016, Brian Danner was interviewed by law enforcement following his arrest for possession of methamphetamine. Danner stated that he used to sell ½ ounce of methamphetamine to Joshua CHAPMAN twice (2) a week in ¼ ounce increments. Danner stated that recently the roles had reversed and he had been selling methamphetamine for CHAPMAN. Danner advised that he CHAPMAN had been making trips to Morristown, TN and picking up an unknown quantity of methamphetamine, possibly \$10,000.00 worth at a time. Danner stated that he bought four (4) ounces of methamphetamine from CHAPMAN in November 2016 for \$3,500.00. Danner advised that Travis LNU also sells methamphetamine for CHAPMAN.

On February 15, 2017, Timothy Holt was interviewed pursuant to his arrest for conspiracy to distribute methamphetamine in the Eastern District of Tennessee. Holt stated that recently, Josh CHAPMAN had stepped up from what he was doing and was distributing methamphetamine.

On June 14, 2017, Amy Mann was arrested in possession of methamphetamine and firearms. A search of her cellular telephone revealed the following text messages with telephone number (423) 534-9539, saved under "*Josh Chapman*":

**June 10, 2017**

Mann to CHAPMAN, "*Need to speak to u asap call me*"

Mann to CHAPMAN, "*I on way to Thorpe if want to ride*"

CHAPMAN to Mann, "*Oh shit*"

CHAPMAN to Mann, "*Hate to b him*"

Mann to CHAPMAN, "*Yea u better not say a fucking word I swear to God*"

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann advised Joshua CHAPMAN that she was going to meet up with Brandon Thorpe (previously indicted in the Eastern District of Tennessee in a related drug conspiracy).

**June 11, 2017**

Mann to CHAPMAN, "*I need u asap*"

CHAPMAN to Mann, "*Whats up. I was sleep*"

Mann to CHAPMAN, *"Hey I want to buy your Springfield and anyuck on the other two"*

CHAPMAN to Mann, *"Let me get up"*

CHAPMAN to Mann, *"Who this, Amy or Terry"*

Mann to CHAPMAN, *"Amy"*

CHAPMAN to Mann, *"Hey whats up ma. Everything ok"*

CHAPMAN to Mann, *"Imma getting ready walk out door. Imma call u if u have a min"*

Mann to CHAPMAN, *"Yea jus come on to my house"*

Mann to CHAPMAN, *"Cause Terry has my stuff but my man dude coming so I needed to see ya"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann told Joshua CHAPMAN to come by her residence to see her. I believe that Mann advised CHAPMAN that Terry DALTON had her methamphetamine ("*stuff*"), her main supplier (Shawn FARRIS) was on his way, and she needed money from CHAPMAN to give to FARRIS.

On January 24, 2018, CS-14 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in the Eastern District of Tennessee. CS-14 stated that Joshua CHAPMAN had given him user amounts of methamphetamine.

On March 6, 2018, Joshua CHAPMAN was interviewed by law enforcement. After being advised his Miranda rights, CHAPMAN provided information regarding his knowledge of methamphetamine trafficking in Northeast Tennessee and Southwest Virginia.

CHAPMAN stated that he began selling methamphetamine approximately two (2) years ago to support his family. CHAPMAN stated that at first he was selling methamphetamine for Tim Green and was selling two (2) to three (3) ounces every day or two, which covered a period of three (3) to four (4) months.

CHAPMAN stated that following Green's arrest, CHAPMAN began making trips to Georgia with Scott Stone and Miles Key. CHAPMAN stated that they would meet with a black female named Saleemah. CHAPMAN advised that Saleemah would also come to Bristol to meet with them. CHAPMAN stated that between the months of October and December 2017, he obtained ½ to one (1) kilogram of methamphetamine from Saleemah every other day for \$200.00 per ounce. CHAPMAN stated that he, Stone and Keys split the methamphetamine three (3) ways. CHAPMAN stated that Stone also obtained heroin from Saleemah on a couple of occasions.

CHAPMAN advised that while he was dealing with Saleemah, he was introduced to another source of methamphetamine out of North Carolina by Travis Davis. CHAPMAN stated that the source in North Carolina was two (2) to three (3) "Mexicans". CHAPMAN stated that he met the "Mexicans" thirty to forty-five minutes down Interstate 77 from Interstate 81 just inside the state of North Carolina at a truck stop. CHAPMAN stated that between October and November 2017, he obtained ten (10) to twenty (20) ounces of methamphetamine from the "Mexicans". CHAPMAN further stated that other people in Northeast, TN who were also dealing with the "Mexicans" were Teryn FELTY and Cody Blevins.

CHAPMAN stated that "*Nick*" HOWINGTON and "*Nikki*" (STICKEL) were two (2) people that he had used as a "plug" (source of methamphetamine) from time to time. He further

stated that HOWINGTON went to Todd MULLINS a lot, and that "*Nikki*" has been in the dope game a long time.

CHAPMAN advised that he has obtained methamphetamine from Amy Mann and Gary MCFARLANE. CHAPMAN stated that he had been to MCFARLANE's house to obtain the methamphetamine.

CHAPMAN advised that he has obtained methamphetamine from Todd and Robin MULLINS in the past and described MULLINS' house as a "Trap House" (house used to store illegal drugs).

According to the records of NCIC, Joshua Todd CHAPMAN was arrested in 2007 and 2008 for Possession of a Controlled Substance. In 2016, CHAPMAN was arrested for Possession of a Schedule III and IV Controlled Substance for Resale, Possession of Methamphetamine for Resale, and Possession of a Weapon During a Felony.

**Saleemah Lashawn ROBERSON, aka "*Georgia*", aka "*Lema*"**

On June 29, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 591-7287 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from June 20 to June 29, 2017. The following is an excerpt from the search warrant results:

**June 26, 2017**



(706)748-8943 (Saleemah ROBERSON) to FARRIS, *"Hey this is Saleemah look Levi went to jail and I had gave him the majority of it and nobody was trying to pay u brought what I had to Ga and Rico robbed me"*

FARRIS to ROBERSON, *"Why couldn't you of told me this sooner and why has JR been lying saying he didn't no what happens Levi only got busted with a half do you no where the rest is at"*

ROBERSON to FARRIS, *"No Dee was suppose to round it up but then she went to jail and JR really hadn't spoken to me even now I left my phone at truck stop in Alabama"*

FARRIS to ROBERSON, *"Do you no were JR mite have it"*

ROBERSON to FARRIS, *"Haven't been in touch with anyone I was terrified 49000 it's what Levi had to give me I just got all my google contacts I'm going to send us number to someone who said they know everyone who had money for Levi"*

FARRIS to ROBERSON, *"No I didn't think he had it because he would have paid you"*

FARRIS to ROBERSON, *"Because JR acted like it was no big deal and never looked for it so I accused him of stilling it from me"*

FARRIS to ROBERSON, *"I thank he has it"*

FARRIS to ROBERSON, *"But he says he didn't"*

ROBERSON to FARRIS, *"I have to get back into my Facebook to get the number Rico stole my other phone and had been contacting people acting like its me so my mother shut my Facebook down"*

**Later in the same conversation:**

FARRIS to ROBERSON, *"It's alright I just don't know why JR acts like it's nothing"*

FARRIS to ROBERSON, *"He hasn't even faced me sence then"*

ROBERSON to FARRIS, *"I don't either I damn sure didn't I was terrified and hrs knew Dee was suppose to round it up he could have helped"*

ROBERSON to FARRIS, *"I was scared to attempt communication with my family JR could've helped"*

FARRIS to ROBERSON, *"Dee Dee couldn't find anything because I was at her house the next morning after Levi got arrested and she was looking all over for it she didn't no it was mine she was trying to help me get a car back"*

ROBERSON to FARRIS, *"That's because he had gave it all out the person that hit me on Facebook said he knows everyone that owes Levi money"*

ROBERSON to FARRIS, *"I'm going to send u a pick of the message shoo you can see who it is"*

FARRIS to ROBERSON, *"Ok"*

FARRIS to ROBERSON, *"Do you no Levi first and last name"*

ROBERSON to FARRIS, *"I know the last name is Bennett"*

Based on my training and experience and knowledge of this investigation, I believe that Saleemah ROBERSON contacted Shawn FARRIS to discuss ROBERSON "fronting" Levi

BENNETT methamphetamine that ROBERSON had obtained from FARRIS. I believe that BENNETT did not hold up his end of the deal and went to jail. I believe that ROBERSON was scared of FARRIS and the repercussions of losing the methamphetamine so ROBERSON left the area. I believe that the total loss of methamphetamine/money for FARRIS was \$49,000.00.

On July 20, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that she was a distributor of methamphetamine for Shawn FARRIS and others. CS-4 stated that FARRIS used to send the methamphetamine to the residence of "Georgia", a black female who also sold methamphetamine for FARRIS. CS-4 stated that "Georgia" sold methamphetamine to Heather Ashley DAVIS, Terry DALTON and others. CS-4 stated that "Georgia" believed that the "Feds" were watching her and moved out of town. CS-4 stated that "Georgia" also had suppliers of methamphetamine out of Georgia. (Your affiant is aware that a nickname for Saleemah ROBERSON is "Georgia" and she is a black female.)

On July 26, 2017, John Ratcliff was arrested in Bristol, TN in possession of 1.3 kilograms of crystal methamphetamine and a handgun. Ratcliff cooperated with law enforcement and gave consent to have his phone searched. Pursuant to the search of Ratcliff's phone, the following text messages were retrieved between Ratcliff and Sean MAIDLOW:

**July 3, 2017**

Ratcliff to MAIDLOW, *"I turned that stuff around yesterday I wasn't happy with the quality"*

MAIDLOW to Ratcliff, *"So what happened, did you get it"*

Ratcliff to MAIDLOW, *"No I was not happy with the quality of the work at hand it didn't seem right so I had dude turn it around"*

MAIDLOW to Ratcliff, *"Ok"*

Ratcliff to MAIDLOW, *"All that bullshit for there bullshit wasn't good enough for me and I said nope I'll go home first"*

MAIDLOW to Ratcliff, *"Shit that suck well at least we still have the money to send back"*

Ratcliff to MAIDLOW, *"Yea I got \$6500 of it right now and then the rest Lema is coming with for what I bought and returned"*

Ratcliff to MAIDLOW, *"I left it in her house and dude is coming to see her now with it and she is gonna meet me in Erwin with the rest as soon as they are done"*

MAIDLOW to Ratcliff, *"So the 10 I gave you plus the seven he has all ready plus the 3 I have that 20 so we r still good"*

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff had made a trip to Georgia to obtain methamphetamine from Saleemah ROBERSON (*"Lema"*). I believe that Ratcliff took \$10,000.00 of Sean MAIDLOW's money, but was not happy with the quality of the methamphetamine, so returned with \$6,500.00 and was awaiting the rest when ROBERSON came up to Erwin, TN. I believe that MAIDLOW confirmed that they had \$20,000.00 between them to purchase more methamphetamine.

On October 30, 2017, CS-3 was interviewed by law enforcement. CS-3 stated that Saleemah ROBERSON was a black female who brings methamphetamine to the area from Georgia. CS-3 stated that she has known ROBERSON for a long time going back to her days of

selling marijuana. CS-3 stated that ROBERSON stopped selling marijuana and began selling methamphetamine because it was more profitable. CS-3 stated that she had obtained a couple of pounds of methamphetamine from ROBERSON since February 2017.

CS-3 stated that a few days after Levi BENNETT last went to jail in Virginia, Shawn FARRIS came to her residence claiming that BENNETT owed him \$40,000.00 for seven (7) pounds of methamphetamine. CS-3 advised that she did not know anything about that. CS-3 stated that she had never seen BENNETT with seven (7) pounds of methamphetamine and the most she had ever seen BENNETT with was two (2) pounds. CS-3 stated that the seven (7) pounds of methamphetamine was supposedly "fronted" to ROBERSON who in turn "fronted" the methamphetamine to BENNETT for resale.

On December 29, 2017, the Commerce, Georgia Police Department responded to a possible kidnapping/armed robbery call at 621 Ridgeway Rd., Commerce, GA. Scott Stone (deceased) had apparently been kidnapped at gunpoint by Miles Key over a drug debt. During the course of the investigation, the occupants of the house were interviewed, including Saleemah ROBERSON. Pursuant to the investigation, a search warrant was obtained for ROBERSON's cellular telephone, bearing telephone number (347) 984-0597. According to the text messages, ROBERSON had facilitated drug transactions between Stone and others in the Bristol area.

On January 30, 2018, Saleemah ROBERSON was interviewed again by detectives in Commerce, GA. ROBERSON stated that the kidnapping/armed robbery incident that occurred on December 29, 2017 was the result of a drug transaction. ROBERSON stated that Miles Key had provided \$8,000.00 to Scott Stone to purchase 16 ounces of methamphetamine from



ROBERSON. ROBERSON stated that Stone never gave the methamphetamine to Key and so Key attempted to rob Stone.

ROBERSON stated that prior to the arrival of Stone that night, ROBERSON attempted to appease Key and provided him with four (4) ounces of methamphetamine that she obtained in Athens, GA.

On March 6, 2018, Joshua CHAPMAN was interviewed in Bristol, VA. CHAPMAN stated that since a search warrant was executed at the residence of Tim Green (summer 2017, subsequently indicted in the Eastern District of Tennessee in a related conspiracy), CHAPMAN, Scott Stone and Miles Key made trips to Georgia and obtained methamphetamine from Saleemah. CHAPMAN did not know Saleemah's last name, but described her as a black female who lived in Georgia.

CHAPMAN stated that between October and December 2017, they purchased ½ to one (1) kilogram of methamphetamine every other day from Saleemah and split it three (3) ways. CHAPMAN stated that they paid \$200.00 per ounce. CHAPMAN stated that Stone also purchased heroin from Saleemah. CHAPMAN stated that Saleemah also made trips to the Bristol area to sell methamphetamine.

On March 13, 2018, CS-29 was interviewed in Abingdon, VA. CS-29 stated that he was a methamphetamine user who shared with others who needed it. CS-29 stated that most of his methamphetamine was supplied by Joshua CHAPMAN. CS-29 stated that in December 2017, he accompanied Scott Stone and others to Commerce, Georgia, where Stone was attempting to purchase five (5) or six (6) ounces of methamphetamine. CS-29 stated that Stone still owed a drug debt and was taken at gunpoint.

On March 28, 2018, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 791-6721 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from March 22 to March 28, 2018. The following is an excerpt from the search warrant results:

**March 19, 2018**

FARRIS to (347) 984-0597 (Saleemah ROBERSON), *"Are you going to send the money today. Just want to know if I need to send another because I only send on Monday Tuesday and Wednesday"*

ROBERTSON to FARRIS, *"Yes I'm sorry I was knocked out I'm going to send out to u tomorrow does it need to be sent 2day or just priority"*

FARRIS to ROBERSON, *"Do not overnight it just send it priority"*

ROBERTSON to FARRIS, *"Ok let u know when it's on it's way"*

FARRIS to ROBERSON, *"Ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Shawn FARRIS inquired of Saleemah ROBERSON if she was going to send him drug proceeds that day so he could send her more methamphetamine. I believe that FARRIS advised ROBERSON that he only sent methamphetamine on Monday, Tuesday and Wednesday. I believe that ROBERSON advised FARRIS that she would send his drug proceeds the following day, priority mail.

**March 21, 2018**

ROBERTSON to FARRIS, "*On my way to the pussy office*"

FARRIS to ROBERSON, "*Ok*"

ROBERTSON to FARRIS, "*Lol post office*"

FARRIS to ROBERSON, "*Ok thank u*"

Based on my training and experience, and my knowledge of this investigation, I believe that Saleemah ROBERSON advised Shawn FARRIS that she was on her way to send him drug proceeds.

On April 6, 2018, a controlled purchase of two (2) ounces of crystal methamphetamine was made from Saleemah ROBERSON in Bristol, VA for \$1,400.00 by an ATF Undercover Agent (UC). During the transaction, ROBERSON told the UC that she had brought eight (8) ounces of methamphetamine to Bristol from her home in Commerce, GA for distribution. Further conversation took place about the possibility of future sales that ROBERSON would make to the UC.

According to the records of NCIC, Saleemah Lashawn ROBERSON had no prior drug felonies.

**Donald Zachary SNYDER, aka "*Stryker*"**

On March 1, 2017, Elizabeth EATON was interviewed by law enforcement. EATON stated that her main source of supply for methamphetamine was Skyler SEBASTIAN. EATON explained that Ernest Worley delivered methamphetamine for SEBASTIAN. EATON stated that SEBASTIAN's source for methamphetamine was Zach LNU (known to DEA as Donald Zachary SNYDER) who lived off of Interstate 81 at exit 10. EATON advised that the night she was

arrested she had just provided \$400.00 to Worley and was expecting him to deliver an amount of methamphetamine. EATON advised that she always fronted money to Worley. EATON advised that she had purchased ½ to one (1) ounce of methamphetamine from SEBASTIAN, through Worley at least ten (10) times, for \$500.00 per ounce. EATON also stated that she had purchased marijuana from SEBASTIAN and Worley usually receiving ½ to one (1) ounce each time. EATON explained that SEBASTIAN had introduced Worley to her and described Worley as working for SEBASTIAN.

On June 14, 2017, Amy Mann was arrested in possession of methamphetamine and firearms. A search of her cellular telephone revealed the following text messages with telephone number (276) 206-0158 saved under "Z":

**June 10, 2017**

SNYDER to Mann, *"Is Jr still n jail?!? Did they say where"*

Mann to SNYDER, *"All hell yeah where can we meet"*

SNYDER to Mann, *"Where r u"*

Mann to SNYDER, *"I jus pulled in home"*

Mann to SNYDER, *"But let me come to u"*

(Later that same day)

Mann to SNYDER, *"Yea that what I told ya should been 3 even so owe 5250 and had 4 on me police have a g no other way like I said I got it covered tho so going to pay u today another 3 plus gun and give u rest this afternoon. Cause I personal watching over things"*

*till it get back in check I sorry thought caught what I laying down u mad about splitting it up”*

*SNYDER to Mann, “That’s straight just making sure we were all on same page didn’t wanna feel like I sold the trailer, 4wheeler, n my tools for half of asking price. But I told u I’d work w n I’m a man of my word. Hmu whenever you ready to c me this afternoon. B safe n have a good I”*

(Later that same day)

*Mann to SNYDER, “I have Thorpe and says has the money and says we going to get”*

*Mann to SNYDER, “Hey u heard from him”*

*SNYDER to Mann, “Yesm I’m with him actually lol”*

*Mann to SNYDER, “Ok I meet you all or u come get me”*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann met with Zach SNYDER and obtained a pound of methamphetamine, for which she was to pay \$10,500.00. I believe that Mann paid \$3,000.00 to SNYDER, had an additional \$4,000.00 on her, and agreed to pay another \$3,000.00 and a gun later in the day. I believe that later in the day, Mann and Brandon Thorpe (previously indicted in the Eastern District of Tennessee in a related drug conspiracy) planned to meet with SNYDER and his methamphetamine source of supply (Shawn FARRIS) to pay the rest of the debt and obtain more methamphetamine.

On June 15, 2017, Zachary SNYDER was the subject of a traffic stop by law enforcement. SNYDER was the operator of a motorcycle at the time of the stop. After advising



SNYDER of why he was stopped, SNYDER was asked if he had any weapons or any other items the officer should be concerned with. SNYDER advised that he had a small amount of marijuana. At this time, SNYDER removed a backpack from his back and opened it and showed the officer a small bag of marijuana. A further search of the backpack revealed three (3) small bags that contained marijuana and a large Ziploc style bag that contained approximately two (2) ounces of marijuana. A PVC pipe containing approximately twelve (12) grams of methamphetamine and a pouch containing additional methamphetamine was found.

SNYDER was advised of his Miranda Rights and after being advised of his rights he advised that he had a handful of people to whom he sold drugs.

On July 20, 2017, CS-4 was interviewed in Abingdon, VA. CS-4 stated that Zach SNYDER, aka "*Stryker*", was a methamphetamine distributor for Shawn FARRIS. CS-4 stated that SNYDER also served as a debt collector and enforcer for FARRIS. CS-4 stated that SNYDER's cellular telephone number was saved in her phone under "Z".

On July 26, 2017, John Ratcliff was arrested in Bristol, TN in possession of 1.3 kilograms of crystal methamphetamine and a handgun. Ratcliff cooperated with law enforcement and gave consent to have his phone searched. Pursuant to the search of Ratcliff's phone, telephone number (276) 206-0158 was found to be saved under "SNYDER". The following text messages were contained on Ratcliff's phone with "SNYDER":

**July 1, 2017**

Ratcliff to SNYDER, "*Yo u gonna be able to make it today with me bro?*"

SNYDER to Ratcliff, *"Nah g I wish I could but gt a Vmax last night n tags r no good n Harley isn't ready for that longa haul quite yet, my bad homie typed u a text n never hit send B4 daylight"*

Ratcliff to SNYDER, *"Ok man well I'm going anyway dude I got to make this happen for us"*

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff contacted Zachary SNYDER to discuss a motorcycle trip they were supposed to take to Georgia to obtain methamphetamine.

**July 18, 2017**

Ratcliff to SNYDER, *"Yo next time you come around Bristol my way hit me up I need to holler at u"*

Ratcliff to SNYDER, *"Got something u might be interested in"*

SNYDER to Ratcliff, *"Ok wat u got homie"*

Ratcliff to SNYDER, *"Ruger 9mm p89"*

Ratcliff to SNYDER, *"It's a nice piece"*

SNYDER to Ratcliff, *"Rite on I have one there good pieces n I'll take depending on what u looking to get out it"*

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff contacted Zachary SNYDER to discuss the trade of a Ruger 9mm p89 handgun.

**July 19, 2017**

Ratcliff to SNYDER, "*U common to see me today?*"

SNYDER to Ratcliff, "*Omw*"

Ratcliff to SNYDER, "*Ok*"

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff inquired of Zachary SNYDER if he was coming to obtain additional methamphetamine from Ratcliff.

**July 23, 2017**

Ratcliff to SNYDER, "*Are u good still or no?*"

SNYDER to Ratcliff, "*No I need frfr u gt?*"

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff contacted Zachary SNYDER to determine if he needed additional methamphetamine. I believe that SNYDER advised Ratcliff that he needed methamphetamine.

**July 26, 2017**

Ratcliff to SNYDER, "*U need to come see me today bro*"

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff advised Zachary SNYDER to come see him to obtain additional methamphetamine and/or pay back drug proceeds.

On August 9, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone numbers (276) 206-0158 (Donald Zachary SNYDER) and (276) 274-6648 (Darlene BARRETT). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from July 25 to August 1, 2017. The following is an excerpt from the search warrant results:

**July 23, 2017**

(276) 791-6125 to SNYDER, *"Hey need two zips"*

Based on my training and experience, and knowledge of this investigation I believe that the user of telephone number (276) 791-6125 ordered two (2) ounces of methamphetamine ("2 zips") from Zachary SNYDER.

**July 24, 2017**

(276) 780-1244 to Zachary SNYDER, *"What time tomorrow, I'm out"*

(276) 791-6125 to SNYDER, *"What's up bro we got work"*

(276) 791-6125 to SNYDER, *"Hey I got that peace, and I still need"*

Based on my training and experience, and knowledge of this investigation I believe that the user of telephone number (276) 780-1244 advised Zachary SNYDER that he was out of methamphetamine. I believe that the user of telephone number (276) 791-6125 advised SNYDER that he had methamphetamine ("work"). I believe that later in the day, the user of telephone number (276) 791-6125 advised SNYDER that he had obtained a handgun (*"I got that peace"*) and needed additional methamphetamine.

**July 26, 2017**

(423) 217-9714 (John Ratcliff) to Zachary SNYDER, *"U need to come see me today"*

Approximately eight (8) minutes later the following text was sent:

(423) 366-7544 (Sean MAIDLOW) to SNYDER, *"Hey I'm good"*

Based on my training and experience, and knowledge of this investigation I believe that John Ratcliff and Sean MAIDLOW each contacted Zachary SNYDER and told SNYDER that they had a supply of methamphetamine. Your affiant is aware, through interviews of co-conspirators and others that MAIDLOW was a source of supply of methamphetamine for Ratcliff and SNYDER.

**July 27, 2017**

(276) 780-1244 to Zachary SNYDER, *"So I wanted to do double he said one and then another half but that you would not have the double so if you end up having it call me."*

Based on my training and experience, and knowledge of this investigation I believe that the user of telephone number (276) 780-1244 advised Zachary SNYDER that he wanted double his usual order of methamphetamine, possibly two (2) ounces.

**July 30 and 31, 2017**

(276) 791-6125 to SNYDER, *"Hey bro what's up need that work"*

(276) 791-6459 to SNYDER, *"Call JR asap... he needs work..."*

(276) 780-1244 to SNYDER, *"Am I cut off"*

(276) 780-1244 to SNYDER, *"Please answer me and tell me why? I need work"*

Based on my training and experience, and my knowledge of this investigation, I believe that the user of telephone number (276) 791-6125 advised Zachary SNYDER that he needed methamphetamine (*"need that work"*). I believe that the user of telephone number (276) 791-6459 told SNYDER to call John Ratcliff (*"JR"*) to supply him with methamphetamine (*"he needs work"*). I believe that the user of telephone number (276) 780-1244 asked SNYDER why he had



been cut off from the methamphetamine that SNYDER has previously supplied him. I believe that the user of telephone number (276) 780-1244 told SNYDER that he needed methamphetamine to sell ("*I need work*").

On August 4, 2017, Officer Matt Quillen with the Bristol, Virginia Police Department (BVPD) was operating stationary radar (speed calculating device) on Interstate 81, northbound. The officer noted a white motorcycle enter radar traveling at 118 miles per hour. Quillen pulled out from his position and maintained visual contact with the motorcycle. Quillen observed the motorcycle exit the Interstate at Exit 5. Quillen activated his emergency equipment (blue lights and siren) on Lee Highway near Island Road. The driver looked in the direction of Quillen, accelerated and made a left hand turn onto Island Road. The driver refused to stop and turned onto Wallace Pike and then onto Goose Creek Road. The motorcycle crashed at the intersection of Goose Creek Road and Merrimac Drive. The driver of the motorcycle was identified as Donald Zachary SNYDER. Medical personnel were called to the scene and SNYDER was transported to Bristol Regional Medical Center.

Several items were found in the wreckage of the motorcycle and those items included: approximately 1½ ounces of methamphetamine, ½ ounce of marijuana, a Ruger Model SR40 hand gun and other drug related paraphernalia.

According to the records of NCIC, Donald Zachary SNYDER was arrested in 2017 for Distribution of a Schedule I or II Controlled Substance.

**James Skyler SEBASTIAN**

On February 16, 2017, CS-1 was interviewed pursuant to his arrest for Conspiracy to Distribute Methamphetamine in the Eastern District of Tennessee. CS-1 stated that on February

15, 2017 he arranged for Stephanie Hall and Skyler LNU (believed by your affiant to be Skyler SEBASTIAN) to purchase methamphetamine from his California source. CS-1 advised that this California source lived near Virginia High School in Bristol, VA. CS-1 advised that the source arrived to the purchase location driving a silver Mustang. Your affiant is aware that Shawn FARRIS was a methamphetamine source of supply who lived near Virginia High School and drove a silver Mustang. CS-1 advised that the deal took place with the purchase of 2½ ounces of methamphetamine for \$2,000.00. The purchase took place at the Shell Station across from the Econo Lodge in Bristol, VA.

On February 6, 2017, Bonnie Melton was arrested at the residence of Rachel Sammons in Bristol, TN in possession of methamphetamine, scales and drug paraphernalia. Pursuant to a search of her cellular telephone, it was discovered that telephone number (423) 220-9624 was saved in her contacts under "*Skyler*".

On March 1, 2017, Elizabeth EATON was interviewed by law enforcement. EATON stated that her main suppliers of methamphetamine were Skyler SEBASTIAN and Ernest Worley. EATON explained that Worley delivered methamphetamine for SEBASTIAN. EATON stated that SEBASTIAN's source of supply for methamphetamine was Zach LNU, aka "*Stryker*" (Donald Zachary SNYDER) who lived off of Interstate 81 at exit 10. EATON advised that the night she was arrested she had just provided \$400.00 to Worley and was expecting him to deliver an amount of methamphetamine. EATON advised that she always "fronted" (gave money up front) to Worley. EATON advised that she had purchased ½ to one (1) ounce of methamphetamine from SEBASTIAN, through Worley at least ten (10) times, for \$500.00 per ounce. EATON also stated that she had purchased marijuana from SEBASTIAN and Worley,

usually receiving ½ to one (1) ounce each time. EATON explained that SEBASTIAN had introduced Worley to her and described Worley as working for SEBASTIAN.

On March 6, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 469-2980 (Paul Joseph Whitt). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from February 19 to March 6, 2017. The following is an excerpt from the search warrant results:

**February 20, 2017**

Joe Whitt to (423) 220-9624 (Skyler SEBASTIAN), *"I got what you need now"*

SEBASTIAN to Whitt, *"Fuck yea man. Im over next to TN High. Can you come here?  
This is a house with zero traffic"*

Whitt to SEBASTIAN, *"Where you be bro"*

SEBASTIAN to Whitt, *"Im near VA Ave Rn, can we still meet"*

Whitt to SEBASTIAN, *"Yeah wanna meet me at Shell on Commonwealth"*

SEBASTIAN to Whitt, *"No wheels in on Cypress St"*

Whitt to SEBASTIAN, *"Send me address"*

SEBASTIAN to Whitt, *"401 Cypress St appt 7"*

SEBASTIAN to Whitt, *"Look man some of this isn't my money"*

SEBASTIAN to Whitt, *"There jumping down my throat."*

Whitt to SEBASTIAN, *"Cuz I don't see u"*

SEBASTIAN to Whitt, *"Coming"*

Based on my training and experience, and my knowledge of this investigation, I believe that Joe Whitt advised Skyler SEBASTIAN that Whitt had methamphetamine. I believe that SEBASTIAN gave directions to Whitt so that Whitt could deliver the methamphetamine to SEBASTIAN. I believe that SEBASTIAN advised Whitt that he had other people's money (drug customers') and was anxious to obtain the methamphetamine.

**February 21, 2017**

Joe Whitt to (423) 220-9624 (Skyler SEBASTIAN), *"Hey yo"*

SEBASTIAN to Whitt, *"Man I fell asleep you doing good?"*

Whitt to SEBASTIAN, *"Yes"*

SEBASTIAN to Whitt, *"Awesome, lemme round my cash up. Whole one in a couple hours?"*

SEBASTIAN to Whitt, *"Save a whole one at least"*

Whitt to SEBASTIAN, *"Gotcha covered"*

SEBASTIAN to Whitt, *"Im headed that way"*

Based on my training and experience, and my knowledge of this investigation, I believe that Skyler SEBASTIAN inquired of Joe Whitt if he had methamphetamine ("you *doing*

good?"). I believe that Whitt responded that he did, and SEBASTIAN ordered at least one (1) ounce of methamphetamine (*"whole one at least"*).

**February 22, 2017**

(423) 220-9624 (Skyler SEBASTIAN) to Joe Whitt, *"Ay bro need to see you"*

Whitt to SEBASTIAN, *"Hey yo what are you doing I need Roxanne"*

SEBASTIAN to Whitt, *"Im trying like hell to find me something for the back ache for myself too. Needing to get 4 new tires today. You think I'll get a good price?"*

Whitt to SEBASTIAN, *"You fine on that I've got Roxanne coming over"*

SEBASTIAN to Whitt, *"On my way dude"*

Based on my training and experience, and my knowledge of this investigation, I believe that Skyler SEBASTIAN contacted Joe Whitt to obtain methamphetamine. I believe that Whitt inquired of SEBASTIAN if he could obtain Roxicet (oxycodone), to which SEBASTIAN replied that he was already in the process. I believe that SEBASTIAN proceeded to order four (4) ounces of methamphetamine (*"4 new tires"*), which Whitt agreed to sell to him.

**February 25, 2017**

(423) 220-9624 (Skyler SEBASTIAN) to Joe Whitt, *"Hey brother but I need another 2"*

SEBASTIAN to Whitt, *"My phone died right as I answered. I'm about half way to getting what I said. I'll say definitely by 9 or 10. Let's hit IHop or Cracker Barrel"*

Whitt to SEBASTIAN, *"K"*



Based on my training and experience, and my knowledge of this investigation, I believe that Skyler SEBASTIAN contacted Joe Whitt to obtain two (2) ounces of methamphetamine. I believe that Whitt agreed to meet with SEBASTIAN at the IHop or Cracker Barrel, most likely at exit 7 (I-81) in Bristol, VA.

**February 28, 2017**

(423) 220-9624 (Skyler SEBASTIAN) to Joe Whitt, *"Same thing bud just lemme know the plan."*

Based on my training and experience, and my knowledge of this investigation, I believe that Skyler SEBASTIAN contacted Joe Whitt to obtain the same amount of methamphetamine.

**March 1, 2017**

Joe Whitt to (423) 220-9624 (Skyler SEBASTIAN), *"Checking in on my ppl"*

SEBASTIAN to Whitt, *"That's what's up man. I appreciate that man. Hey man imma meet your ol lady here in a min. You want me to give her that 5 I owe ya?"*

Whitt to SEBASTIAN, *"Yeah but I should be with her"*

SEBASTIAN to Whitt, *"Oh ok cool. I'm headed to the Pinnacle rn."*

Based on my training and experience, and my knowledge of this investigation, I believe that Skyler SEBASTIAN advised Joe Whitt that he was meeting with Whitt's girlfriend (believed to be Rachel Sammons at the time) to pay back \$5,000.00 in drug proceeds.

(In January 2018, both Joe Whitt and Rachel Sammons were indicted in a related conspiracy to distribute methamphetamine in the Eastern District of Tennessee.)

On March 28, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (423) 723-4169 (Terry DALTON). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from March 12 to March 28, 2017. The following is an excerpt from the search warrant results:

**March 17, 2017**

DALTON to (423) 220-9624 (Skyler SEBASTIAN), *"It's Terry"*

DALTON to SEBASTIAN, *"Hey bro what's up with that quarter"*

SEBASTIAN to DALTON, *"Hey I can do 250 on if you take some bud with it"*

DALTON to SEBASTIAN, *"Hey bro I want that 4 sure r u up"*

Based on my training and experience, and my knowledge of this investigation, I believe that Terry DALTON contacted Skyler SEBASTIAN and ordered ¼ ounce of methamphetamine (*"quarter"*) for \$250.00.

**March 20, 2017**

DALTON to (423) 220-9624 (Skyler SEBASTIAN), *"Hey bro u back from seeing the kids"*

SEBASTIAN to DALTON, *"Not yet"*

DALTON to SEBASTIAN, *"K didn't know I needed almost 3 zipps"*

Based on my training and experience, and my knowledge of this investigation, I believe that Terry DALTON contacted Skyler SEBASTIAN to obtain three (3) ounces of methamphetamine ("*3 zipps*").

**March 21, 2017**

DALTON to (423) 220-9624 (Skyler SEBASTIAN), "*U back n on*"

SEBASTIAN to DALTON, "*I ain't left yet brother. I got some though*"

DALTON to SEBASTIAN, "*When can I get some*"

SEBASTIAN to DALTON, "*When ever bud*"

DALTON to SEBASTIAN, "*...I'll b by 2 hollar at ya shortly I'm making a few plays n then I'll b by I ended up getting a half about 12 or 1 this morning n then u text me ab the time I was getting home I told Summer that it figured I payed a lil more just 2 get something so I could make some n if I would ve waited I could've gotten it from u 4 cheaper*"

SEBASTIAN to DALTON, "*Lol that's how it goes ain't it lol just gimme a shout*"

Based on my training and experience, and my knowledge of this investigation, I believe that Terry DALTON contacted Skyler SEBASTIAN to obtain methamphetamine. I believe that DALTON told SEBASTIAN that he had previously purchased methamphetamine from another person to make some money.

**March 22, 2017**

Terry DALTON to (423) 220-9624 (Skyler SEBASTIAN), *"Hey bro would u b interested in a 38 like mine"*

DALTON to SEBASTIAN, *"Got someone trying 2 trade me one idk if u would b or not"*

SEBASTIAN to DALTON, *"Yea I would"*

Based on my training and experience, and my knowledge of this investigation, I believe that Terry DALTON contacted Skyler SEBASTIAN to ascertain if SEBASTIAN would like a .38 caliber pistol in trade for methamphetamine.

On March 28, 2017, a Confidential Source (CS) working with the Washington County, Virginia Sheriff's Office (WCSO) and Virginia State Police (VSP) contacted Detective Noah Horn and advised that he could purchase methamphetamine from Amy Mann (aka Amy McFarlane). The CS advised that Mann had contacted him and advised that she had plenty of methamphetamine. A deal was set up for the CS to purchase 3.5 grams of methamphetamine from Mann for \$200.00. SA Billy Keene acted in an undercover capacity and agreed to drive the CS. Before the deal could take place Mann contacted the CS and advised that she would not be able to come, but stated that she was sending "Skyler" to deliver the methamphetamine. The CS identified James Skyler SEBASTIAN from a Facebook photo. It was decided that the CS and Keene would meet SEBASTIAN at the Dollar Tree located at Exit 7 in Bristol, Virginia. The CS and Keene arrived at the Dollar Tree and SEBASTIAN arrived a short time later. The CS exited the UC vehicle and got into the vehicle driven by SEBASTIAN. The deal took place with the CS giving SEBASTIAN the \$200.00 and in return receiving the methamphetamine from SEBASTIAN. Once the deal was complete the CS exited the vehicle, got back into the UC vehicle and the CS and Keene traveled to a staging location. Once at the staging location

Detective Noah Horn took possession of the methamphetamine for safekeeping. During a debrief with the CS he advised that during the deal SEBASTIAN had shown him a black back pack that was full of marijuana in one pocket and methamphetamine in another pocket.

On June 1, 2017, CS-3 was interviewed by law enforcement. CS-3 stated that she had obtained methamphetamine from Skyler SEBASTIAN for a two (2) month period. CS-3 also advised that SEBASTIAN and Larry Levi BENNETT were friends and business partners in the distribution of methamphetamine. CS-3 advised that Shawn FARRIS was a source of methamphetamine for SEBASTIAN and BENNETT. CS-3 further advised that SEBASTIAN had a second source for methamphetamine named "*Georgia*" who lived on State Street in Bristol. CS-3 also told law enforcement that her role in helping SEBASTIAN and BENNETT was she would meet with Shawn FARRIS near his house (600 Garden Lane Bristol, VA) and pick up ounce quantities of methamphetamine. CS-3 would then provide the methamphetamine to BENNETT and SEBASTIAN. Once the methamphetamine was sold, CS-3 took the payment for the methamphetamine back to FARRIS.

On June 1, 2017, a Confidential Source (CS) working with the Washington County, Virginia Sheriff's office met with SEBASTIAN at his residence located at 21071 Black Smith Trail. The CS was advised by SEBASTIAN that he had just sold his last bit of methamphetamine, but he would have more later in the day.

On June 2, 2017, members of the United States Marshal's Service and the Washington County, Virginia Sheriff's Office served a search warrant at 21071 Black Smith Trail (residence of Skyler SEBASTIAN). The search warrant was for the person of Kevin Carter, a person wanted by the USMS and WCSO. During the service of the search warrant, Carter was located.



Officers observed in plain view, items associated with the distribution of methamphetamine and could smell what was identified as the odor of marijuana. The house was cleared and secured by the WCSO and the WCSO obtained an additional search warrant to search the residence for illegal narcotics. The search warrant was granted. During the service of the search warrant several narcotics and narcotics related items were located including a large quantity of methamphetamine and marijuana.

On June 14, 2017, Amy Mann was arrested in possession of methamphetamine and a handgun. A search of her cellular telephone revealed the following text messages with telephone number (276) 285-4376, saved under "Skyler":

**April 19, 2017**

Mann to SEBASTIAN, *"Ok these people jus to slow can I send Terry by to get half of a game for me it for Bill and have to get it packages for him"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann contacted Skyler SEBASTIAN and inquired if she could send Terry DALTON over to pick up ½ of 1/8 ounce of methamphetamine (*"half of a game"*) from SEBASTIAN.

**April 21, 2017**

Mann to SEBASTIAN, *"Hey u up??"*

SEBASTIAN to Mann, *"Yea and I need a favor please"*

Mann to SEBASTIAN, *"Sure what is it"*

SEBASTIAN to Mann, *"Need to use your credit card to pay a bill. I'll give you cash"*

Mann to SEBASTIAN, *"Ok sure and I might need a big one from u again love ya lol"*

Based on my training and experience, and my knowledge of this investigation, I believe that Skyler SEBASTIAN inquired of Amy Mann if she would pay a bill for him. I believe that Mann agreed to and ordered one (1) ounce of methamphetamine ("*a big one*") from SEBASTIAN.

**April 22, 2017**

Mann to SEBASTIAN, *"Need to bring ya money and get some more..."*

SEBASTIAN to Mann, *"I just woke up come on over when your ready"*

(Later same day)

Mann to SEBASTIAN, *"Hey have someone who needs a quarter so do u have that and how much??"*

SEBASTIAN to Mann, *"I'm out right now"*

Mann to SEBASTIAN, *"Ok u be good in a few cause also have someone need wholes"*

SEBASTIAN to Mann, *"I hope so"*

Mann to SEBASTIAN, *"How much quarter"*

SEBASTIAN to Mann, *"280"*

Mann to SEBASTIAN, *"Ok be on my way..."*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann contacted Skyler SEBASTIAN to deliver drug proceeds and obtain additional

methamphetamine. I believe that later in the day, Mann ordered ¼ ounce of methamphetamine from SEBASTIAN for \$280.00, and advised SEBASTIAN that once he had more, she had a customer who wanted ounces of methamphetamine ("*someone need wholes*").

**April 23, 2017**

Mann to SEBASTIAN, "*Hey Hun need to come by for couple of things but one is need another quarter...*"

SEBASTIAN to Mann, "*I'll be just a couple hours gotta take a lil trip*"

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann ordered another ¼ ounce of methamphetamine from Skyler SEBASTIAN, who advised her that he had to go pick up.

**April 26, 2017**

Mann to SEBASTIAN, "*Hey is it ok for me to come by and see u*"

SEBASTIAN to Mann, "*Yea of course, I'm really busy though so well have to be sort of quick*"

Mann to SEBASTIAN, "*All well I will wait like 30 before I come I need o pay and get some and wanted to talk a min*"

SEBASTIAN to Mann, "*Ok your good now*"

(Later that same day)

Mann to SEBASTIAN, "*What did u say owe for 5*"

Mann to SEBASTIAN, *"I thought u said 220 but need to know before sell this one"*

SEBASTIAN to Mann, *"Yea sure"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann arranged to meet with Skyler SEBASTIAN to pay him drug proceeds and obtain additional methamphetamine. I believe that Mann and SEBASTIAN agreed that she owed \$220.00 for five (5) grams of methamphetamine.

**April 27, 2017**

SEBASTIAN to Mann, *"Amy I really need your help"*

Mann to SEBASTIAN, *"What ya need"*

SEBASTIAN to Mann, *"I just woke up and my shits gone"*

Mann to SEBASTIAN, *"Like your stuff money stuff in house"*

SEBASTIAN to Mann, *"Everything"*

Mann to SEBASTIAN, *"Hey I think it not Amber behind it was Mikey maybe"*

Mann to SEBASTIAN, *"This is her right?"*

Mann to SEBASTIAN, *"She friends w Thorpe and Tonni??"*

SEBASTIAN to Mann, *"Yea"*

Mann to SEBASTIAN, *"She friends w Heather Ashley so I hitting her up now"*

Mann to Brandon Thorpe, *"Amber Rose stole about 8,000 from Skyler today so if u can help locate her before she spends all his money he will make sure u taken care of"*

Based on my training and experience, and my knowledge of this investigation, I believe that Skyler SEBASTIAN contacted Amy Mann to advise her that he had been robbed of \$8,000.00 in drug proceeds. I believe that Mann contacted several drug associates, including Heather Ashley DAVIS and Brandon Thorpe (subsequently indicted in the Eastern District of Tennessee in a related conspiracy) to try and find the money.

**April 29, 2017**

Mann to SEBASTIAN, *"Hey Hun u home"*

SEBASTIAN to Mann, *"Yes mam"*

Mann to SEBASTIAN, *"I coming to see u shortly. Ring u more money and get and give ya good news"*

SEBASTIAN to Mann, *"Ok then u ok"*

Mann to SEBASTIAN, *"Please tell me u have pain?"*

SEBASTIAN to Mann, *"I do"*

Mann to SEBASTIAN, *"Soon as Terry brings my money I coming out there to see ya and have some good news for u"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann contacted Skyler SEBASTIAN to pay him drug proceeds and obtain additional



methamphetamine (*"Ring u more money and get"*). I believe that SEBASTIAN advised Mann that he had pain pills for her.

**April 30, 2017**

Mann to SEBASTIAN, *"Hey have someone needing a lot could use it to"*

SEBASTIAN to Mann, *"I'm going to get right now"*

Mann to SEBASTIAN, *"Call me before get I can add a lot of money to it"*

Mann to SEBASTIAN, *"Or can ride back over w me I not dealing in that large without someone w"*

Mann to SEBASTIAN, *"It ok where those burgers are half or quarter pound I will have him come her to fix them so I should be ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann contacted Skyler SEBASTIAN to advise him that she had a customer who wanted a large amount of methamphetamine (*"someone needing a lot"*). I believe that SEBASTIAN advised Mann that he was going to pick methamphetamine up from his source, and Mann offered to provide a lot of additional money. I believe that Mann advised SEBASTIAN that her customer was ordering ½ or ¼ pound of methamphetamine (*"burgers are half or quarter pound"*).

**May 1, 2017**

Mann to SEBASTIAN, *"I coming to u first so not taking two vehicles to drop off how many 30's u want going to have him meet me"*

Mann to Todd MULLINS, *"Could u please find me and Sky some pain"*

MULLINS to Mann, *"Yes"*

Mann to SEBASTIAN, *"Hey bro Eric just showed up looking for u so what u want me to tell him to do he said he had some \$\$\$\$ for u let me know what to do bro"*

SEBASTIAN to Mann, *"Get the money and give a half o"*

(276) 285-1884 (Jim) to Mann, *"Did u ever do any good"*

Mann to Jim, *"Yea had whole getting another now"*

Mann to Jim, *"Still at Skyer's"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann inquired of Skyler SEBASTIAN how many 30 mg oxycodone pills ("30's") he wanted. I believe that Mann then contacted Todd MULLINS to ask if he could obtain the pills. I believe that Mann then collected drug proceeds from "Eric" and provided him with ½ ounce of methamphetamine at the direction of SEBASTIAN. I believe that "Jim" inquired of Mann if she ever obtained methamphetamine, and she replied that she had already sold one (1) ounce and was picking up another at SEBASTIAN's.

On June 15, 2017, Amy Mann was interviewed by law enforcement after having been advised of her Miranda Rights. During the interview Mann advised that she had known Skyler SEBASTIAN since December 2016. Mann advised that when she first met him, he sold one (1) ounce of methamphetamine every couple of days. She further advised that in February or March SEBASTIAN began selling one (1) pound of methamphetamine per day. She advised that SEBASTIAN had never sold her methamphetamine, but she had introduced Bill Taylor, Timothy

Barry (Timothy Barry Hall, aka "*Mohawk*") and Brandon Malone to SEBASTIAN so he could sell crystal methamphetamine to them.

On July 20, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that Zach SNYDER (Donald Zachary SNYDER) was a debt collector and enforcer for Shawn FARRIS. CS-4 advised that Skyler SEBASTIAN was supplied methamphetamine by SNYDER. CS-4 further told law enforcement that SEBASTIAN obtained one (1) pound of methamphetamine from Craig Estep in April 2017.

According to the records of NCIC, James Skyler SEBASTIAN was convicted of Possession for Resale of a Schedule I or II Controlled Substance and Possession of a Firearm while in Possession of Drugs in 2018.

**Larry Levi BENNETT**

On December 8, 2016, a Confidential Source (CS) working with the Washington County, Virginia Sheriff's Office (WCSO) was utilized to conduct a controlled purchase of methamphetamine from Levi BENNETT.

The CS met with officers from the WCSO at a pre-determined staging area. The CS advised officers that he/she could purchase two (2) "8 balls" (1/8 ounce each) of methamphetamine from Levi BENNETT. The CS advised that the deal would take place at the home of Michelle Boardwine (known to officers as 145 S. Monte Vista Drive Glade Spring, VA). The CS and CS' vehicle were searched and no illegal items or substances were found in either place. The CS was given \$400.00 of pre-recorded United States currency for the transaction and an audio recorder was placed on the person of the CS.

The CS was followed to the above address by officers and was observed going into the home. Once inside the deal with BENNETT took place. The CS gave BENNETT the \$400.00 and in return received two (2) small Ziploc style bags each containing a crystal substance. BENNETT explained to the CS that the weight of the methamphetamine would be a little short, but he would make it up on the next purchase. The CS left the residence and was followed by officers back to a staging location. The crystal methamphetamine was turned over to officers for safekeeping and lab analysis. The CS and vehicle were searched and no illegal substances or items were found in either place.

On January 12, 2017, CS-11 was interviewed by law enforcement. CS-11 stated that Levi BENNETT was a methamphetamine distributor and sold approximately a few ounces per week. CS-11 stated that BENNETT's cellular telephone number was (276) 782-2761.

On January 18, 2017, CS-12 was interviewed by law enforcement. CS-12 stated that just prior to his arrest, Brandon WHITT supplied her and Levi BENNETT with methamphetamine. CS-12 advised that she and BENNETT traveled together and met WHITT. CS-12 stated that each of them bought an "8 ball" (1/8 ounce). CS-12 paid \$200.00 for her methamphetamine, but was unsure how much BENNETT paid.

On February 2, 2017, a traffic stop was conducted in Kingsport, TN on a vehicle in which David ESTEP, Jr. and Levi BENNETT were passengers. While the vehicle was coming to a stop, ESTEP threw a bag of crystal methamphetamine from the passenger window. Seized from the passenger side floor board was additional crystal methamphetamine. Also seized from the vehicle were scales, plastic baggies and drug paraphernalia. ESTEP was arrested for possession with intent to distribute crystal methamphetamine.

On February 3, 2017, David Estep, Jr. (subsequently indicted in the Eastern District of Tennessee in a related conspiracy) was interviewed by law enforcement. Estep stated that at one time he purchased methamphetamine from Bill Taylor. Estep stated that on one (1) occasion, he and "Levi" met Taylor at the Walmart parking lot at exit 7. Estep stated that he purchased 2½ ounces and "Levi" purchased 1½ ounces of methamphetamine from Taylor.

On February 24, 2017, the Washington County, Virginia Sheriff's Office (WCSO) arrested Levi BENNETT for an outstanding warrant from Smyth County, Virginia. During a search of the vehicle in which BENNETT was a passenger, a multi-colored grinder was found. Inside the grinder, a crystal residue was found that was field tested utilizing a field test kit that has been proven accurate and reliable to law enforcement. The substance tested positive for methamphetamine. BENNETT admitted ownership of the methamphetamine.

On April 4, 2017, CS-12 was arrested by the Smyth County, Virginia Sheriff's Office in Chilhowie, VA in possession of approximately sixteen (16) grams of methamphetamine. Following her arrest, CS-12 provided information to law enforcement regarding her knowledge of drug trafficking in Northeast, TN and Southwest, VA. CS-12 stated that Levi BENNETT was a methamphetamine distributor. CS-12 advised that BENNETT was distributing up to ¼ pound of methamphetamine at a time for the "Farm" (property owned by Lawrence Powell Earhart) in Bristol, TN. CS-12 showed the arresting Deputy a picture of BENNETT holding a piece of crystal methamphetamine that appeared to be six (6) inches long and two (2) inches wide.

On May 17, 2017, CS-13 was interviewed by law enforcement following his arrest for possession with intent to distribute methamphetamine. CS-13 advised that he was a methamphetamine user, who supplied his habit by selling methamphetamine. CS-13 advised that



the seven (7) grams of methamphetamine that he had in his possession at the time of his arrest belonged to "Dee Dee" (Crystal Pharis – subsequently indicted in the Eastern District of Tennessee in a related conspiracy). CS-13 advised that "Dee Dee" was dating "Levi" (BENNETT). CS-13 advised that he had known "Dee Dee" and "Levi" for a few weeks and since meeting them, he had obtained methamphetamine from them several times. CS-13 advised that he had sold approximately three (3) ounces of methamphetamine for "Dee Dee" and "Levi" during the time he had known them.

CS-13 further advised that at some point in the last couple of days, leading to this arrest, he received a text message from "Dee Dee" and "Levi" advising that they had sixteen (16) ounces of methamphetamine.

On June 9, 2017, a search warrant was applied for and obtained in the Eastern District of Tennessee for text message content stored in the accounts of telephone number (423) 278-4353 (Karen Lark). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from May 21 to June 9, 2017. The following is an excerpt from the search warrant results:

**May 21, 2017**

Karen Lark to (423) 480-1254 ("*DeeDee and Levi*"), "*Hey r u coming by? Or do I need 2 walk that way?*"

Based on my training and experience, and my knowledge of this investigation, I believe that Karen Lark contacted Crystal Pharis and Levi BENNETT in an attempt to obtain methamphetamine. (In July 2017, John Ratcliff was arrested in possession of methamphetamine

and a gun. Pursuant to a search of his cellular telephone, it was found that telephone number (423) 480-1254 was saved under "*DeeDee and Levi*".)

**May 24, 2017**

Karen Lark to (423) 480-1254 ("*DeeDee and Levi*"), "*Hey I've only got this phone for now was Goddamn arrested yesterday and left my phone n chics car til 2moro need u 2 call and let me know when ur bringin that 2 me and he said 4 now he just needs the cash*"

Lark to "*DeeDee and Levi*", "*Have u checked w J*"

Lark to "*DeeDee and Levi*", "*Working on shit now? Can u all please come on and get me outta here asap*"

Based on my training and experience, and my knowledge of this investigation, I believe that Karen Lark contacted Crystal Pharis and Levi BENNETT to obtain methamphetamine and cash for an unknown person. I believe that Lark inquired of Pharis and BENNETT if they had checked with Jason Clements ("*J*") regarding his methamphetamine needs.

On June 1, 2017, CS-3 was interviewed by law enforcement. CS-3 identified Shawn FARRIS from a photo that was shown to her. CS-3 advised that FARRIS came to her house the day that Levi BENNETT was arrested. CS-3 advised that FARRIS beat up BENNETT with a Mag flashlight. CS-3 advised that FARRIS was mad because BENNETT owed FARRIS \$28,000.00 for seven (7) pounds of methamphetamine. CS-3 advised that FARRIS was also upset over a stolen car that had been purchased by John Ratcliff, and given to her. CS-3 advised that the vehicle was supposed to be used to pay some of the \$28,000.00 debt.

CS-3 further advised that she had obtained three (3) to four (4) ounces of methamphetamine from FARRIS a couple of times. CS-3 advised that FARRIS fronted the methamphetamine to her and she would have to pay him back \$700.00 per ounce once it was sold. CS-3 advised that she was the go between and did not make anything off of the sales. She did not know where FARRIS lived, other than somewhere near Walgreen's.

CS-3 stated that she obtained one (1) to two (2) ounces of methamphetamine from FARRIS every day since she got out of jail earlier this year. CS-3 stated again that she was given the methamphetamine by FARRIS and would have to pay him after it was sold. CS-3 had to pay him back \$700.00 per ounce. CS-3 stated that she gave all of the methamphetamine she obtained from FARRIS to Levi BENNETT. CS-3 stated that BENNETT sold the methamphetamine, but CS-3 kept a small amount for her personal use.

CS-3 stated that she had heard from BENNETT's friends that FARRIS had fronted him seven (7) pounds of methamphetamine and that is why BENNETT owed FARRIS \$28,000.00.

On June 15, 2017, Amy Mann was interviewed by law enforcement after having been advised of her Miranda Rights. Mann stated that she had known Levi BENNETT for about a month. She advised that BENNETT had never sold her methamphetamine, but they had used methamphetamine together. She advised that "Dee Dee" (Crystal Pharis) was BENNETT's girlfriend and she helped BENNETT obtain crystal methamphetamine.

On June 29, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 591-7287 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless,

agents received text messages stored in those accounts from June 20 to June 29, 2017. The following is an excerpt from the search warrant results:

**June 26, 2017**

(706) 748-8943 (Saleemah ROBERSON) to (276) 591-7287 (Shawn FARRIS), *"Hey this is Saleemah look Levi went to jail and I had gave him the majority of it and nobody was trying to pay u brought what I had to Ga and Rico robbed me"*

FARRIS to ROBERSON, *"Why couldn't you of told me this sooner and why has JR been lying saying he didn't no what happens Levi only got busted with a half do you no where the rest is at"*

ROBERSON to FARRIS, *"No Dee was suppose to round it up but then she went to jail and JR really hadn't spoken to me even now I left my phone at truck stop in Alabama"*

FARRIS to ROBERSON, *"Do you no were JR mite have it"*

ROBERSON to FARRIS, *"Haven't been in touch with anyone I was terrified 49000 it's what Levi had to give me I just got all my google contacts I'm going to send us number to someone who said they know everyone who had money for Levi"*

FARRIS to ROBERSON, *"No I didn't think he had it because he would have paid you"*

FARRIS to ROBERSON, *"Because JR acted like it was no big deal and never looked for it so I accused him of stilling it from me"*

FARRIS to ROBERSON, *"I thank he has it"*

FARRIS to ROBERSON, *"But he says he didn't"*

ROBERSON to FARRIS, *"I have to get back into my Facebook to get the number Rico stole my other phone and had been contacting people acting like its me so my mother shut my Facebook down"*

**Later in the same conversation:**

FARRIS to ROBERSON, *"It's alright I just don't know why JR acts like it's nothing"*

FARRIS to ROBERSON, *"He hasn't even faced me sence then"*

ROBERSON to FARRIS, *"I don't either I damn sure didn't I was terrified and hrs knew Dee was suppose to round it up he could have helped"*

ROBERSON to FARRIS, *"I was scared to attempt communication with my family JR could've helped"*

FARRIS to ROBERSON, *"Dee Dee couldn't find anything because I was at her house the next morning after Levi got arrested and she was looking all over for it she didn't no it was mine she was trying to help me get a car back"*

ROBERSON to FARRIS, *"That's because he had gave it all out the person that hit me on Facebook said he knows everyone that owes Levi money"*

ROBERSON to FARRIS, *"I'm going to send u a pick of the message shoo you can see who it is"*

FARRIS to ROBERSON, *"Ok"*

FARRIS to ROBERSON, *"Do you no Levi first and last name"*



ROBERSON to FARRIS, *"I know the last name is Bennett"*

Based on my training and experience and knowledge of this investigation, I believe that Saleemah ROBERSON utilized the text messaging service of her cellular telephone to contact Shawn FARRIS via the text messaging service of his cellular telephone. I believe the conversation centered on ROBERSON "fronting" Levi BENNETT methamphetamine that ROBERSON had obtained from FARRIS. I believe that BENNETT did not hold up his end if the deal and went to jail. I believe that ROBERSON was scared of FARRIS and the repercussions of losing the methamphetamine so ROBERSON left the area. I believe that the total loss of methamphetamine/money for FARRIS was \$49,000.00.

On July 26, 2017, John Ratcliff was interviewed pursuant to his arrest for possession of 1.3 kilograms of crystal methamphetamine and a gun. Ratcliff stated that when Levi BENNETT was arrested, the methamphetamine that he had in his possession came from Shawn FARRIS.

On October 30, 2017, CS-3 was again interviewed by law enforcement. CS-3 stated that Shawn FARRIS was the person who was currently bringing all the methamphetamine to the area. CS-3 advised that Larry Addair used to work for FARRIS before his murder. CS-3 stated that she had known FARRIS for approximately one (1) year. CS-3 stated that she obtained methamphetamine from FARRIS, about one (1) ounce per week for the last six (6) months, approximately twenty four (24) ounces total. CS-3 advised that she really didn't sell the methamphetamine, that Levi BENNETT did most of the selling.

CS-3 advised that a few days after Levi BENNETT last went to jail in Virginia, FARRIS came to her residence claiming that BENNETT owed him \$40,000.00 for seven (7) pounds of methamphetamine. CS-3 advised that she did not know anything about that, she had never seen

BENNETT with seven (7) pounds of methamphetamine, the most she had ever seen BENNETT with was two (2) pounds. CS-3 advised that the seven (7) pounds of methamphetamine was supposedly "fronted" to ROBERSON who fronted the methamphetamine to BENNETT for resale.

On January 19, 2018, Christopher SMILEY was interviewed by law enforcement. SMILEY stated that he had obtained methamphetamine from "Levi". Based on your affiant's knowledge of this investigation, your affiant believes that "Levi" is Levi BENNETT.

On January 24, 2018, CS-14 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in the Eastern District of Tennessee. CS-14 stated that Levi BENNETT and "Dee Dee" (known to agents as Crystal Pharis) stayed at his residence. CS-14 stated that he had purchased methamphetamine from BENNETT and Pharis. CS-14 believed that BENNETT and Pharis were getting methamphetamine from "J.R." (known to agents as John Ratcliff).

According to the records of NCIC, Larry Levi BENNETT was convicted of Manufacturing Methamphetamine in 2013. In 2016, BENNETT was convicted of Violation of Probation. In 2017, BENNETT was charged with Possession of a Schedule I or II Controlled Substance.

#### **Terry Melvin DALTON**

On March 23, 2017, a controlled purchase of one (1) ounce of methamphetamine and heroin was made from Terry DALTON in Abingdon, VA for \$1,150.00.

On March 28, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (423) 723-4169 (Terry DALTON). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from March 12 to March 28, 2017. The following is an excerpt from the search warrant results:

**March 12, 2017**

(276) 591-0170 to (423) 723-4169 (Terry DALTON), *"Give me a call please it's important I have some money for you"*

(276) 591-0170 to DALTON, *"Need some stuff if you can even do that for me if not that I don't have any money for you...lol"*

(276) 591-0170 to DALTON, *"Plz lmk what's up need to know when you plan on doing anything or if you're even going to be... I need a half game. Just lmk what's up"*

Based on my training and experience, and my knowledge of this investigation, I believe that the user of telephone number (276) 591-0170 advised Terry DALTON on his cellular telephone that he or she had drug proceeds to pay to DALTON and wanted an additional 1/16 ounce of methamphetamine. I know that drug distributors use the terms "8 ball", "ballgame" or "game" to refer to 1/8 ounce of a substance, usually methamphetamine or cocaine. Therefore, "half a game" would be a reference to 1/16 ounce.

**March 13, 2017**

(423) 797-0657 to (423) 723-4169 (Terry DALTON), *"I need 2 wholes"*

DALTON to (423) 797-0657, *"Idk if they got it GA. Just left making a trip"*

(276) 447-0492 to DALTON, *"Hey it's Denver, can you do half a game buddy?"*

DALTON to (276) 447-0492, *"Yeah"*

DALTON to (276) 447-0492, *"I'm n Blountville so it'll take me a min"*

(276) 447-0492 to DALTON, *"That's cool. Can you take me to pick up the money?"*

DALTON to (276) 447-0492, *"I'm here"*

(423) 797-0657 to DALTON, *"I have a ride I can use I'm supposed to collect money mostly yours I also have people wanting if you have anything I could use the help make us both a little"*

Based on my training and experience, and my knowledge of this investigation, I believe that the user of telephone number (423) 797-0657 ordered two (2) ounces of methamphetamine ("2 wholes") from Terry DALTON on his cellular telephone. I believe that DALTON advised the user of telephone number (423) 797-0657 that he did not know if his supplier had the amount of methamphetamine requested and that his supplier had just left making a trip to pick up more methamphetamine. I believe that DALTON agreed to sell 1/16 ounce of methamphetamine ("*half a game*") to the user of telephone number (276) 447-0492. I believe that the user of (423) 797-0657 advised DALTON that he or she needed to collect drug proceeds that belonged to DALTON, and inquired if DALTON had additional methamphetamine so he/she could sell the methamphetamine to make money.

**March 27, 2017**

(423) 408-8785 to (423) 723-4169 (Terry DALTON), *"I need a half g"*

(423) 408-8785 to DALTON, *"You good"*

(423) 408-8785 to DALTON, *"I know somebody looking for Tek to"*

DALTON to (423) 408-8785, *"I am but it's my wife's b day so I'm not doing anything until later"*

(423) 963-4716 to DALTON, *"You at home baby"*

DALTON to (423) 963-4716, *"K I'll b by there no I'm at exit 7"*

(423) 963-4716 to DALTON, *"Ok baby I figured you were home with the wife"*

DALTON to (423) 963-4716, *"No I had 2 pick up"*

(423) 963-4716 to DALTON, *"Ok baby well I'm about to need more"*

Based on my training and experience, and my knowledge of this investigation, I believe that the user of telephone number (423) 408-8785 contacted Terry DALTON and inquired about obtaining ½ gram of methamphetamine and a Subutex (*"Tek"*) from DALTON. I believe that DALTON told the user of telephone number (423) 408-8785 that he could make the sale, but it would be later. I believe the user of telephone number (423) 963-4716 advised DALTON that he/she was about out of methamphetamine and needed more.

On April 26, 2017, Terry DALTON sold approximately three (3) ounces of crystal methamphetamine for \$2,250.00 to three (3) undercover (UC) police officers at 21071 Blacksmith Trail Bristol, Virginia (residence of Skyler SEBASTIAN). The following text messages were exchanged between DALTON and the UC Agents leading up to the transaction:

**April 24, 2017**



Terry DALTON to UCA, *"Hey bro u al needing we just got right....Imk asap I can bring it 2 u"*

UCA to DALTON, *"What's number for 5?"*

**April 25, 2017**

DALTON to UCA, *"3750"*

DALTON to UCA, *"Getttingb down there isn't it"*

UCA to DALTON, *"Sounds good"*

**April 26, 2017**

DALTON to UCA, *"When u want that bro"*

UCA to DALTON, *"Hey man just call me when you can talk"*

UCA to DALTON, *"Hey are you wantin to get together on the 3 or what?"*

DALTON to UCA *"I'm on the way to get it now can u meet me"*

Based on my training and experience, and my knowledge of this investigation, I believe that Terry DALTON and the UC Agent discussed the purchase of five (5) ounces of methamphetamine for \$3,750.00. I believe that DALTON agreed to sell three (3) ounces of methamphetamine to the UC.

On June 1, 2017, CS-3 was interviewed in Bristol, VA. CS-3 stated that she purchased methamphetamine from Shawn FARRIS, Sean MAIDLOW aka *"Calr"*, Terry DALTON, Heather Ashley DAVIS, Gary MCFARLANE, Skyler SEBASTIAN and others.

On July 20, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that *"Georgia"* was a black female who sold methamphetamine for Shawn FARRIS. CS-4 stated that Heather Ashley DAVIS, Terry DALTON and others sold methamphetamine for *"Georgia"*.

On August 18, 2017, CS-4 was interviewed again pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that Terry DALTON was one of the largest methamphetamine distributors in the area. CS-4 stated that the methamphetamine sold by DALTON was supplied by Shawn FARRIS.

On January 19, 2018, Christopher SMILEY was interviewed in Bristol, VA. SMILEY stated that he was a user of various drugs since 2000. SMILEY stated that he left this area to get away from drugs, but returned in February 2017. SMILEY stated that he hung out at the residence of Sarah Donahue where he used methamphetamine and met many drug suppliers including Terry DALTON, Skyler (SEBASTIAN) and others.

On January 24, 2018, CS-14 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Greeneville, TN. CS-14 stated that he had obtained methamphetamine from Terry DALTON.

On April 7, 2018, CS-28 was interviewed following her arrest in Saltville, VA in possession of ½ ounce of methamphetamine. CS-28 stated that the previous day, she had purchased one (1) ounce of methamphetamine from Terry DALTON in Bristol, VA for \$975.00. CS-28 stated that she observed at least three (3) ounces of methamphetamine in DALTON's possession at the time.

According to the records of NCIC, Terry Melvin DALTON was arrested in 2009 for Possession of a Schedule III Narcotic. In 2017, DALTON was charged with Possession of Methamphetamine for Resale and Possession of a Firearm by a Convicted Felon. In 2018, DALTON was charged with Possession/Deliver/Sell/Manufacture of Methamphetamine,

Maintaining a Dwelling for Controlled Substance and Possession of Unlawful Drug Paraphernalia.

**Heather Ashley DAVIS, aka Heather Ashley HALL**

On December 28, 2016, Paul Joseph Whitt was interviewed by law enforcement at the Bristol, Virginia Jail. Whitt was advised of his Miranda rights and waived them and advised he would speak to law enforcement. Whitt stated that Ashley DAVIS was a major methamphetamine distributor in Northeast, Tennessee. Whitt advised that he grew up with DAVIS on Meadowview Road in Bristol, TN. Whitt advised that he could make purchases of methamphetamine from DAVIS. Whitt advised that DAVIS was supplied methamphetamine by a male from Atlanta, Georgia who was extremely flamboyant about his drug transactions. Whitt believed that source of supply to DAVIS sold "fed dope" and was protected by the "feds".

On January 24, 2017, Brandon Runyon was interviewed in Sullivan County, TN. Runyon stated that he was a narcotics and gun runner for the Vice Lord street gang in Atlanta, Georgia and was a user of heroin. Runyon stated that the reason he was a runner was because he owed them money for heroin that he stole. Runyon advised that he had delivered methamphetamine, heroin and guns for the gang for approximately two (2) years. Runyon advised that the gang would pay him with methamphetamine and heroin. Runyon advised that he did not like methamphetamine and would sell the methamphetamine to several people in Northeast Tennessee that included Heather DAVIS.

On February 12, 2017, ATF CS 10272 was interviewed by law enforcement. The CS stated that he/she had seen Heather DAVIS give \$1,000.00 to Adam Fulbright, who then got a

bag of methamphetamine from Gary Miller for her. (Fulbright and Miller were subsequently indicted in the Eastern District of Tennessee in a related conspiracy.)

On February 15, 2017, Timothy Holt was interviewed pursuant to his arrest for conspiracy to distribute methamphetamine in the Eastern District of Tennessee. Holt stated that at the time of the interview Joe Whitt was dating Heather Ashley DAVIS. Holt stated that DAVIS was Whitt's new "plug" (source for drugs). Holt advised that DAVIS was getting her methamphetamine from a girl named "Georgia". Holt stated that DAVIS had obtained methamphetamine from Jerry Smith and also from Holt a few times.

On March 8, 2017, CS-2 was interviewed by law enforcement. CS-2 stated that Ashley DAVIS was a distributor of methamphetamine for "*Mama Lisa*" (Lisa Weems). CS-2 stated that he used to be a bodyguard for DAVIS. CS-2 stated that DAVIS was also supplied methamphetamine by "*Tennessee*" or "*Hillbilly*".

On March 23, 2017, CS-27 was interviewed by law enforcement. CS-27 advised that he had observed Jacob Armstrong in possession of one piece of crystal methamphetamine that weighed 122 grams and \$20,000.00. CS-27 stated that Bob Reynolds and Ashley DAVIS robbed Armstrong.

On March 24, 2017, officers from the Bristol, TN Police Department responded to the area of Blue Ridge Drive in reference to a domestic disturbance involving a black sedan that was leaving the area. Upon their arrival to the area, officers located a black Audi car and conducted a traffic stop on the car for making an improper turn.

Heather Ashley DAVIS was found to be the driver of the vehicle and Brandon Eskridge was a passenger in the vehicle. DAVIS advised the officer's that she did not have a driver's

license and a check through the Tennessee DMV revealed that DAVIS' license was revoked. While speaking to DAVIS and Eskridge officers observed a set of digital scales in plain view sitting in the console area under the radio. Another officer observed a syringe cap sitting next to the scales. At that time DAVIS and Eskridge were detained and a search of the vehicle was conducted. Officers were able to locate a makeup bag in the driver's side floor board. Inside the makeup bag a larger plastic bag containing another bag with a large amount of crystal like substance consistent with methamphetamine, multiple pills consistent with Oxycodone, Clonazepam, Buprenorphine and other drugs. The methamphetamine had an approximate weight of thirty three (33) grams. Also, a small amount of green plant material consistent with marijuana was found. Additionally, found inside the makeup bag was \$716.00 and several syringes.

DAVIS was advised of her Miranda Rights and she advised that she did not know to whom the drugs belonged. DAVIS advised that she was unsure how much money she had, but thought it was between \$500.00 and \$600.00. The amount was actually \$716 and was in increments of 20's, 10's, 5's and 1's. DAVIS advised that she had gotten the money by doing people's tax returns and being paid under the table.

Based on the circumstances, DAVIS was arrested by the BTPD on the same date.

On June 1, 2017, CS-3 was interviewed in Bristol, VA. CS-3 stated that she purchased methamphetamine from Shawn FARRIS, Sean MAIDLOW aka "*Cali*", Terry DALTON, Heather Ashley DAVIS, Gary MCFARLANE, Skyler SEBASTIAN and others.

On July 20, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that "*Georgia*" was a black



female who sold methamphetamine for Shawn FARRIS. CS-4 stated that Heather Ashley DAVIS, Terry DALTON and others sold methamphetamine for "Georgia".

On August 24, 2017, the BTPD was notified by the Tennessee Bureau of Investigation that the crystal substance had been tested and was found to be 31.25 grams of methamphetamine

Following her arrest, a search warrant was obtained for the contents of DAVIS' phone (760-320-0035). The following is an excerpt of text messages from the phone:

**March 22, 2017**

DAVIS to (423) 797-0657, "*G want hand us shit because we owe her money*"

DAVIS to (423) 797-0657, "*I need to make some money*"

DAVIS to (423) 797-0657, "*So I need to bring her money to shit*"

(423) 797-0657 to DAVIS, "*Ok. Well come to me*"

(423) 797-0657 to DAVIS, "*Then I can talk to you. I have a cheaper and equal option*"

(423) 797-0657 to DAVIS, "*You are fucked up dude*"

(423) 797-0657 to DAVIS, "*I have shit already*"

Based on my training and experience, and knowledge of this investigation, I believe that Heather Ashley DAVIS contacted the user of telephone number (423) 797-0657 via the text messaging service of their cellular telephones. I believe that DAVIS advised the user of telephone number (423) 797-0657 that she could not obtain methamphetamine from "Georgia" because she owed her money, ("*G want hand us shit because we owe her money*"). I believe



that the user of telephone number (423) 797-0657 told DAVIS that they could provide her with methamphetamine.

**March 23, 2017**

Telephone Number (423) 765-3797 to DAVIS, *"Im at Sarahs for a minute..holler at me"*

(423) 765-3797 to DAVIS, *"I got tons hitting me up...just cant get product...that's the way it goes though lol...just wanted to check on you and make sure you are ok...I put my back out and hour ago...maybe have to go to VA I have my PC with me if you get time to go over grpahics...be careful love ya."*

DAVIS to (423) 765-3797, *"I have plenty"*

DAVIS to (423) 765-3797, *"Or I can get it"*

(423) 765-3797 to DAVIS, *"Kk...same prices? 3 5 & 9"*

DAVIS to (423) 765-3797, *"Yes one problem c.o.d. until I get caught up"*

(423) 765-3797 to DAVIS, *"I will have to see who will give me money...we know how that goes...I know I owe 200...I will have that either tomorrow or Monday. When my money goes in"*

DAVIS to (423) 765-3797, *"I'm 4000 in the red"*

Based on my training and experience, and knowledge of this investigation, I believe the user of telephone number (423) 765-3797 contacted Heather Ashley DAVIS via the text messaging service of their cellular telephones. I believe that the user of telephone number (423) 765-3797 told DAVIS that she had a lot of people who were looking for methamphetamine and

she could not find any. I believe that DAVIS advised the user of telephone number (423) 765-3797 that she had methamphetamine, but she would have to have the money at the time of the sale. I believe that DAVIS told the user of telephone number (423) 765-3797 that she owed her source of supply for methamphetamine \$4,000.00 (*"I'm 4000 in the red"*).

On April 12, 2017, CS-33 was interviewed by law enforcement. CS-33 stated that he had seen Ashley DAVIS with pickup loads of methamphetamine in totes that had to be lifted with a pallet jack. CS-33 stated that he had seen this at a garage near Wallace School.

On October 30, 2017, CS-3 was interviewed by law enforcement. CS-3 advised that "*Georgia*" was a white female who lived near Bristol Motor Speedway who brings methamphetamine into the area. CS-3 advised that Heather Ashley DAVIS was a distributor of methamphetamine for "*Georgia*".

On January 24, 2018, CS-14 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Greeneville, TN. CS-14 stated that he had known Heather Ashley DAVIS, aka HALL, since high school. CS-14 stated that DAVIS had a connection for methamphetamine, possibly an ounce or more from a source in Virginia. CS-14 advised that DAVIS used and sold methamphetamine, and CS-14 had obtained methamphetamine directly from her.

On January 22, 2018, Rachael Sammons was interviewed pursuant to her arrest for conspiracy to distribute methamphetamine in the Eastern District of Tennessee. Sammons stated that she had known Heather Ashley DAVIS since high school, and didn't really want to talk about her. Sammons stated that knew that DAVIS sold methamphetamine and they had dealt

with each other over the years. Sammons stated that C.J. Mitchell obtained his methamphetamine from DAVIS. (Mitchell was indicted in the same conspiracy as Sammons.)

According to the records of NCIC, Heather Ashley DAVIS was charged with Possession of a Schedule III and IV Controlled Substance. In 2010, DAVIS was convicted of Possession with Intent to Manufacture Schedule I or II Controlled Substance. In 2011 and again in 2012, DAVIS was charged with Promotion of Methamphetamine and Conspiracy to Promote Methamphetamine Manufacturing, with at least one (1) conviction. In 2014, DAVIS was convicted of Violation of Probation. In 2016, DAVIS was arrested for Possession of Methamphetamine for Resale.

**Brianna Nicole WOODBY, aka Brianna NICKLES**

On January 22, 2017, officers with the Bristol, Tennessee Police Department (BTPD) encountered Brianna Nicole WOODBY. Officers had observed the vehicle, a black Nissan Pathfinder, parked at the Speedway Inn, a known location where illegal narcotics are bought and sold in the Bristol, TN area. Upon approaching the vehicle, Brianna WOODBY was found in the driver's seat of the vehicle.

While conducting police checks regarding WOODBY, a K-9 from the BTPD conducted a free air sniff around WOODBY's vehicle. The K-9 alerted to the presence of narcotics around the front driver's side door. WOODBY was then asked if she knew why the K-9 would alert to the presence of narcotics. During this time the officer observed what appeared to be a small Ziploc style bag between the front passenger seat and the center console of the vehicle. The officer asked WOODBY what the bag was and she appeared to look around the area and eventually pulled the bag from the area of the console. The officer noted that the bag appeared

to contain other smaller bags that contained a crystalline like substance. Upon closer inspection the larger bag contained six (6) smaller bags, which all contained a crystalline substance.

The officer had WOODBY step from her vehicle and asked her if she had anything on her person. WOODBY retrieved from her bra area, a large sum of United States currency. WOODBY initially stated it was \$700.00, but later stated it was \$750.00. The money was folded into \$100.00 increments.

A search warrant was applied for and obtained for the contents of WOODBY'S cellular telephone (405-472-0057). The following is an excerpt from the search warrant results:

**January 22, 2017**

(423) 534-5891 ("Too Short") to WOODBY, *"You can go serve everyone else but me"*  
*Fuck dat looks lk ya got home team covered. Ill find it elsewhr"*

Based on my training and experience, and my knowledge of this investigation, I believe that the user of telephone number (423) 534-5891 was upset with WOODBY because she would not sell them methamphetamine ("*serve*").

**January 22, 2017**

WOODBY to (276) 202-4834 (D Honaker), *"What's up"*

Honaker to WOODBY, *"Waiting on cash! Lol can u get any bud"*

WOODBY to Honaker, *"Yes"*

Honaker to WOODBY, *"What's the tag"*

WOODBY to Honaker, "250"

Honaker to WOODBY, *Can you do half for 125*"

WOODBY to Honaker, "Yes"

Based on my training and experience, and my knowledge of this investigation, I believe that the user of telephone number (276) 202-4834 (D Honaker) asked Brianna WOODBY to provide him/her with ½ ounce of marijuana for \$125.00.

On March 23, 2017, CS-27 was interviewed by law enforcement. CS-27 advised that at one point he was selling up to sixteen (16) ounces of methamphetamine per day. CS-27 advised that the majority of his methamphetamine was going to Heath Perry, Erica LNU, Jacob Armstrong and Brianna NICKLES aka WOODBY. CS-27 advised that he and WOODBY were dating at the time.

On July 26, 2017, John Ratcliff was interviewed pursuant to his arrest for possession of 1.3 kilograms of crystal methamphetamine and a gun. Ratcliff stated that Brianna WOODBY sold methamphetamine for Shawn FARRIS who lived on Garden Lane in Bristol, VA. Ratcliff advised that WOODBY was afraid of FARRIS and could not get away from him. Ratcliff stated that WOODBY had been to California with FARRIS to obtain methamphetamine.

On August 16, 2017, James Nicholas "Nick" HOWINGTON was interviewed in Abingdon, VA. HOWINGTON stated that "Bri" (Brianna WOODBY) was a heavy set white female who was a distributor of methamphetamine for Shawn LNU (Shawn FARRIS). HOWINGTON stated that WOODBY was sleeping with an older white male who lived with FARRIS.



On September 25, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 791-6721 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from September 9 to September 13, 2017. The following is an excerpt from the search warrant results:

**September 13, 2017**

(423) 612-8257 (Brianna WOODBY) to (276) 791-6721 (Shawn FARRIS), *"If ya'll really thought I was telling don't you think ya'll would done be in prison!!! That's fucked up as loyal iv been to you guys. I have been to California with ya'll I know the roads and the house I've been too. If I was telling ya'll would been in jail. Don't ever say that about me I'm not that kind of person and its fucked up Sofia would ever say that to me"*

Based on my training and experience, and knowledge of this investigation, I believe that Brianna WOODBY contacted Shawn FARRIS via the text messaging service of their cellular telephones. I believe that WOODBY was mad because FARRIS and Sofia Perez had accused her of talking to the police about them and their illegal narcotics distribution. I believe that WOODBY told FARRIS that she had been to California with him and knew where the source of supply was and if she wanted them to go to jail, they would already be there.

On September 27, 2017, CS-31 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Greeneville, TN. CS-31 stated that Brianna WOODBY introduced him to "Shawn" who was from California. CS-31 stated that "Shawn" had bought a house located on the Virginia side of Bristol. CS-31 stated that "Shawn" left for days at a time



and drove to California to pick up methamphetamine. On one (1) occasion, CS-31 observed vacuum sealed bags at "Shawn's" residence that contained methamphetamine. Based on your affiant's knowledge and experience in this investigation, your affiant believes that when referring to "Shawn", CS-31 was referring to Shawn FARRIS.

On January 24, 2018, CS-14 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Greeneville, TN. CS-14 stated that he had obtained methamphetamine from "*Bri*" (known to agents as Brianna WOODYBY).

On March 16, 2018, Darlene BARRETT was interviewed by law enforcement. BARRETT stated that Shawn FARRIS was her source of supply for methamphetamine. BARRETT stated that at one point in early 2017, FARRIS lived in Bristol, VA, but had moved back to California. BARRETT advised that she had been to FARRIS' house and had met "*Bri*" NICKLES (Brianna WOODYBY) while she was there. BARRETT advised that after FARRIS left Bristol, NICKLES contacted her and told her that if she needed anything (methamphetamine) she could contact NICKLES.

According to the records of NCIC, Brianna Nicole WOODYBY was charged with Manufacture of Methamphetamine and Maintaining a Dwelling Where Drugs are Sold in 2017.

#### **Donald Shane HAWTHORNE**

On June 1, 2017, CS-3 was interviewed by law enforcement. CS-3 provided information on numerous methamphetamine distributors in Southwest Virginia and Northeast Tennessee. CS-3 stated that the following drug dealers carried guns: Terry DALTON, (Timothy) Barry Hall, Ashley DAVIS, Gary MCFARLANE, Amy McFarlane (Mann), Shane HAWTHORNE, and others.

On June 14, 2017, Amy Mann was arrested in possession of methamphetamine and firearms. A search of her cellular telephone revealed the following text messages with telephone number (276) 494-1235, saved under "*Shane Halthorne*":

**May 26, 2017**

HAWTHORNE to Mann, "*Ok thank you Amy really mean it you be careful and if u need me u call*"

Mann to HAWTHORNE, "*I might in little bit need to flip some but also got other shit going on I will catch up w u soon as u leave there and u welcome and thanks*"

(Later in the day)

Mann to HAWTHORNE, "*Did we make any off that last night??"*

HAWTHORNE to Mann, "*Yea I still got over half of it and that stuff he wanted*"

Mann to HAWTHORNE, "*Ok I coming to get ya wait there*"

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann advised Shane HAWTHORNE that she may need him to sell methamphetamine for her ("flip some"). I believe that HAWTHORNE advised Mann that he still had over half of the methamphetamine from the night before.

**May 28, 2017**

HAWTHORNE to Mann, "*I need a damn car I'm so pissed Levi promised me he would have me a car there and he lied and I'm stuck without a ride and being fucked on making my money*"

Mann to HAWTHORNE, *"...but I can let u use mine for a bit cause I think I found someone to run my stuff so I can make money"*

HAWTHORNE to Mann, *"I got 3 os gone no car to go do it"*

Mann to HAWTHORNE, *"Btw why didn't Deedee and Levi pay the money for Terry?? Or why didn't u bring them there space??"*

HAWTHORNE to Mann, *"What"*

Mann to HAWTHORNE, *"So Sky never got any money on the half which we used 9 of to bond out Terry then I told him since we had some of it u was getting that spack for him he said he never got it"*

HAWTHORNE to Mann, *"I haven't got mine yet Amy Terry got some and I haven't got to get mine from dude yet"*

Mann to HAWTHORNE, *"No I mean the stuff u went and got the other night for him u said u had it"*

HAWTHORNE to Mann, *"I'm taking care of him today first before any"*

HAWTHORNE to Mann, *"...what we sold to get Terry out was what Sky gave me to sell and only had to give him 400. Ok bond was 320 the spack was 220 so how did I go wrong here I am giving him spack of mine cause wasn't giving him shitty spack but I could have I am sorry I wasn't there yesterday but I'm not trying to go back to jail and I didn't think it was safe in town at all I'm sorry"*

Based on my training and experience, and my knowledge of this investigation, I believe that Shane HAWTHORNE advised Amy Mann that without the car promised him by Levi BENNETT, he couldn't sell methamphetamine. I believe that HAWTHORNE told Mann that he could sell three (3) ounces of methamphetamine if he had a ride. I believe that Mann told HAWTHORNE that she used \$900.00 of money owed to Skyler SEBASTIAN from the sale of ½ pound of methamphetamine to pay a bond for Terry DALTON, but Crystal CS-3 ("Dee Dee") and BENNETT should have paid it. I believe that Mann asked HAWTHORNE why he didn't deliver "spackle" ("spac", "spake" – a synthetic drug) to SEBASTIAN as payment for the bond money.

**May 31, 2017**

HAWTHORNE to Mann, *"Hey I'm bringing heat to you but I really would like to buy it or rent it to keep using it please too much fuck shit people pulling and really would feel better having it on me please"*

Based on my training and experience, and my knowledge of this investigation, I believe that Shane HAWTHORNE advised Amy Mann that he was bringing her gun ("heat") back to her, but asked that she let him use it since it was getting common for people to pull guns during drug deals.

**June 1, 2017**

Mann to HAWTHORNE, *"Hey have some money someone owes u also where u want to meet??"*

HAWTHORNE to Mann, *"That who owes me"*

Mann to HAWTHORNE, *"I got Jon's"*

HAWTHORNE to Mann, *"Give it to Terry"*

Mann to HAWTHORNE, *"Ok towards the 500"*

HAWTHORNE to Mann, *"Yea"*

Mann to HAWTHORNE, *"Jon wants to know if I can get him some has cash"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann advised Shane HAWTHORNE that she had drug proceeds from "Jon" to pay to him. I believe that HAWTHORNE advised Mann to give the money to Terry DALTON. I believe that Mann asked HAWTHORNE if he had any additional methamphetamine to sell to "Jon" since he had cash.

On July 19, 2017, CS-15 was interviewed in Abingdon, VA pursuant to a proffer agreement entered into with the U.S. Attorney's Office. CS-15 stated that he had purchased "gravel" (synthetic drug) from Shane HAWTHORNE and others at his house. CS-15 stated that he paid HAWTHORNE \$180.00 per gram of "gravel".

On August 18, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that Kevin Carter was a distributor of methamphetamine and "spack" (synthetic drug) for "J" in Elizabethton. CS-4 stated that when Carter owed too much money to "J", Shane HAWTHORNE took his place and introduced Terry DALTON and Brandon Thorpe to "J".



On March 6, 2018, Joshua CHAPMAN was interviewed in Bristol, VA. CHAPMAN stated that Shane HAWTHORNE and Travis Davis were making trips to Georgia to obtain methamphetamine, possibly from Saleemah (ROBERSON).

On March 13, 2018, CS-29 was interviewed in Abingdon, VA. CS-29 stated that he was a methamphetamine user who shared with others who needed it. CS-29 stated that most of his methamphetamine was supplied by Joshua CHAPMAN. CS-29 stated that he was recently arrested in possession of methamphetamine and a handgun after leaving the residence of Kesha Necessary. CS-29 stated that Shane HAWTHORNE was present at the residence and was supposed to have five (5) or six (6) ounces of methamphetamine.

According to the records of NCIC, Donald Shane HAWTHORNE was arrested for Possession of Drugs and Unlawful Drug Paraphernalia in 2015.

#### **Gary Lee MCFARLANE**

In August 2016, 2<sup>nd</sup> DTF Special Agent Jason Roark was contacted by Michael Hawks' probation officer regarding a related drug conspiracy. During the conversation the probation officer advised that Hawks provided drug trafficking information. Hawks advised that Tinika PICKEL had been arrested the previous night in Bristol, TN for possession of crystal methamphetamine (approximately 1/8 ounce plus a small amount of marijuana). Hawks stated that PICKEL had purchased the methamphetamine from Gary MCFARLANE on Grable Road near Exit 7 (Bristol, VA).

On December 6, 2016, CS-16 was interviewed by law enforcement. CS-16 stated that Gary MCFARLANE was a big player in the methamphetamine game. CS-16 stated that recently, MCFARLANE had developed a serious drug problem (using his own product) and he

was unable to get back on top. CS-16 stated that MCFARLANE had been dealing a lot with Corey Gibson from Bristol, TN. CS-16 stated that MCFARLANE had been buying ounces at a time from Gibson, but had messed up money and owed Gibson for one (1) ounce of methamphetamine.

On January 26, 2017, CS-17 was interviewed by law enforcement. CS-17 stated that Gary MCFARLANE traded "gravel" (Alpha PVP) with David Estep, Jr. for methamphetamine.

In February 2017, Brandon Malone was arrested in Sullivan County, TN on drug related charges. Pursuant to a search of his cellular telephone, telephone number (423) 723-4938 was found to be saved under "*Gary Bristol*".

On March 8, 2017, a Confidential Source (CS) working with the Washington County, Virginia Sheriff's Office (WCSO) and Virginia State Police (VSP) contacted Gary MCFARLANE. MCFARLANE advised the CS that he could sell the CS one (1) ounce of methamphetamine for \$500.00. MCFARLANE gave the CS directions to where he was located. SA Billy Keene (VSP) acted in an undercover capacity and was the driver for the CS. The CS and Keene went to the area to find MCFARLANE, but were unable to locate him. The CS made contact with MCFARLANE and it was arranged for them to meet at Sam's Club parking lot. A short time later the meeting took place. The CS exited the UC vehicle and got into the vehicle with MCFARLANE and another male whom MCFARLANE introduced as Dave. MCFARLANE advised the CS that he did not have the full ounce of methamphetamine, but he did have two (2) grams that he could sell the CS for \$180.00. The CS completed the deal with MCFARLANE and MCFARLANE advised the CS that he would have a lot more later and would be able to sell the CS one quarter (1/4) ounce of methamphetamine. The CS exited his

vehicle and got back into the UC vehicle. The CS and Keene traveled back to a staging location and the methamphetamine was turned over to Detective Noah Horn (WCSO) for safekeeping. The methamphetamine was field tested and was positive for methamphetamine.

On March 8, 2017, CS-2 was interviewed by law enforcement. CS-2 stated that Gary MCFARLANE was a distributor of methamphetamine. CS-2 stated that MCFARLANE's right hand man was Doug Ferguson. CS-2 advised that he had sold ½ ounces of methamphetamine to Ferguson as well as trading methamphetamine for "Roxi's" (oxycodone) with Ferguson.

On March 9, 2017, Elizabeth EATON was interviewed by law enforcement. EATON stated that she was a methamphetamine distributor who sold methamphetamine to support her own methamphetamine use. EATON stated that one of her main sources of supply for methamphetamine was Gary MCFARLANE. EATON stated that MCFARLANE's source of supply for methamphetamine was his sister, Amy McFarlane aka Amy Mann.

On March 14, 2017, a CS working with the WCSO and VSP agreed to make a purchase of ¼ ounce of methamphetamine from Gary MCFARLANE for \$300.00. The CS traveled to MCFARLANE'S residence, with SA Billy Keene (acting in an undercover role), located at 170 Grable Drive Bristol, Virginia. Upon arrival the CS went into the residence and met with MCFARLANE. MCFARLANE advised the CS that the methamphetamine was not there yet, but he had sent Lydia and Dana to pick it up. While inside the residence waiting for the methamphetamine to arrive, MCFARLANE became agitated and the CS left the residence to wait off site for the methamphetamine to arrive.

While waiting for a call from MCFARLANE, the CS was contacted via Facebook messenger by Jason Moles. Moles advised the CS that he was on his way to MCFARLANE's

with the methamphetamine instead of Lydia and Dana. SA Keene drove the CS back to MCFARLANE's residence on Grable Drive and the CS went into the residence. The deal took place with Moles weighing out ¼ ounce of methamphetamine and giving it to MCFARLANE. The CS placed the \$300.00 on the bed and MCFARLANE placed the methamphetamine on the bed and picked up the money. The CS retrieved the methamphetamine and left the residence and got back into the UC vehicle. Keene and the CS met with Detective Noah Horn at a staging location. Detective Horn took possession of the methamphetamine for safekeeping.

On June 1, 2017, CS-3 was interviewed in Bristol, VA. CS-3 stated that she purchased methamphetamine from Shawn FARRIS, Sean MAIDLOW aka "*Cali*", Terry DALTON, Heather Ashley DAVIS, Gary MCFARLANE, Skyler SEBASTIAN and others.

On July 19, 2017, CS-15 was interviewed in Abingdon, VA pursuant to a proffer agreement entered into with the U.S. Attorney's Office. CS-15 stated that he had been at the residence of Gary MCFARLANE on many occasions when MCFARLANE and others sold methamphetamine. CS-15 stated that the most methamphetamine he had observed in MCFARLANE's possession was one (1) ounce.

On October 30, 2017, CS-3 was interviewed by law enforcement. CS-3 advised that she had obtained a couple of grams of methamphetamine from Gary MCFARLANE for her personal use.

On March 6, 2018, Joshua CHAPMAN was interviewed in Sullivan County, TN. CHAPMAN stated that when he was out of methamphetamine he would get it from Amy Mann and Gary MCFARLANE. CHAPMAN stated that MCFARLANE and Mann lived close to each

other in Bristol, VA at Exit 7. CHAPMAN stated that he had picked up methamphetamine from MCFARLANE's house.

According to the records of NCIC, Gary Lee MCFARLANE was charged with Possession With Intent to Distribute Schedule I or II Controlled Substance.

**Elizabeth Pauline EATON, aka Elizabeth CUNNINGHAM**

On March 3, 2017, Elizabeth EATON was interviewed in Bristol, VA. EATON stated that the night she was arrested in Bristol for having a pipe containing methamphetamine she had two (2) "8 balls" (1/8 ounce each) hidden inside her person. EATON advised that she disposed of the methamphetamine when she arrived at the jail via the shower.

EATON stated that she had been to the "Ranch" several times (known residence of John Lapis in Bristol, VA) and Lapis had been to her house. EATON advised that Lapis was one of her sources of supply for methamphetamine. EATON advised that Lapis "fronted" her ounces of methamphetamine. Once the methamphetamine was sold she paid Lapis \$400.00 per ounce. EATON stated that she was able to find a cheaper source of supply. EATON stated that Brandon Thorpe offered her ounces of methamphetamine for \$300.00 each.

On March 9, 2017, Elizabeth EATON was interviewed again by law enforcement. EATON stated that she was a methamphetamine distributor who sold methamphetamine to support her own methamphetamine use. EATON stated that her main source of supply for methamphetamine was Gary MCFARLANE. EATON stated that MCFARLANE's source of methamphetamine for methamphetamine was his sister, Amy McFarlane aka Amy Mann.



On June 15, 2017, a search warrant was executed at 9518 Reedy Creek Rd., Bristol, VA, the residence of Elizabeth EATON. Seized pursuant to the search warrant were approximately 17 grams of crystal methamphetamine, digital scales, numerous small Ziploc baggies, and two (2) cellular telephones. EATON was charged with possession with intent to distribute methamphetamine.

On July 20, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that when methamphetamine was transported into the Bristol area, it was divided up at several different locations, including the residence of Elizabeth EATON.

On March 1, 2018, Elizabeth EATON was interviewed again by law enforcement. EATON stated that she started buying and selling methamphetamine because she and her family were having financial trouble. EATON advised that she had bought and sold methamphetamine with Doug Ferguson who lived in the Benhams area of Washington County, Virginia. EATON advised that she had known Ferguson for many years. EATON advised that the amounts she bought and sold to/from Ferguson never exceeded an "8 ball" (1/8 ounce) per deal.

EATON stated that her main source of supply for methamphetamine was Skyler SEBASTIAN. EATON explained that Ernest Worley delivered methamphetamine for SEBASTIAN. EATON stated that SEBASTIAN's source of supply for methamphetamine was Zach LNU (known to DEA as Donald Zachary Snyder) who lived off of Interstate 81 at Exit 10. EATON advised that the night she was arrested she had just provided \$400.00 to Worley and was expecting him to deliver an amount of methamphetamine. EATON advised that she always "fronted" money to Worley. EATON advised that she had purchased ½ to one (1) ounce of

methamphetamine from SEBASTIAN, through Worley at least ten (10) times, for \$500.00 per ounce. EATON also stated that she had purchased marijuana from SEBASTIAN and Worley, usually receiving ½ to one (1) ounce each time. EATON explained that SEBASTIAN had introduced Worley to her and described Worley as working for SEBASTIAN.

According to the records of NCIC, Elizabeth Pauline EATON was convicted of Obtaining Prescriptions by Fraud in 2010. In 2012 and 2014, EATON was convicted of Violation of Probation. In 2017, EATON was charged with Possession of Schedule I or II Controlled Substance.

**Matthew Todd MULLINS**

On February 22, 2017, Matthew Todd MULLINS was interviewed in Bristol, VA. MULLINS stated that Joe and Brandon WHITT were brothers and large scale methamphetamine dealers. MULLINS stated that he had recently observed Joe WHITT in possession of three (3) kilograms of methamphetamine. MULLINS stated that WHITT supplied methamphetamine to Gary MCFARLANE and Skyler SEBASTIAN. MULLINS stated that he had purchased methamphetamine from WHITT on several occasions, for other people.

On March 8, 2017, CS-2 was interviewed by law enforcement. CS-2 stated that had sold quarter (1/4) ounce quantities of methamphetamine to Todd MULLINS.

On March 22, 2017, a Confidential Source (CS) working with the Washington County, Virginia Sheriff's Office and the Virginia State Police advised that Todd MULLINS and Robin Strickler were selling methamphetamine and gravel. The CS advised that he/she could possibly make a controlled purchase of methamphetamine from Strickler. The CS, in the presence of law enforcement called Strickler via Facebook messenger. The CS asked Strickler if she had any

methamphetamine for sale and Strickler advised the CS that she was done at home at the time. Strickler advised the CS that he/she could go to her house and wait for her to get home or she told the CS that Todd (MULLINS) was there and he could sell the CS methamphetamine as well.

The CS traveled to the MULLINS/Strickler residence located at 158 Saul Drive Bristol, Virginia. SA Billy Keene (VSP) drove the CS and acted in an undercover role. Upon arrival to the residence the CS went inside and met with Todd MULLINS. He advised the CS that Strickler had not arrived home, but he made the deal with the CS. MULLINS sold the CS one (1) gram of methamphetamine for \$80.00. Once the transaction was complete the CS exited the residence and the CS and Keene traveled to a staging location. The methamphetamine was turned over to Detective Noah Horn for safekeeping.

On April 7, 2017, A Confidential Source (CS) working with Washington County, Virginia Sheriff's Office (WCSO) and Virginia State Police (VSP) contacted Detective Noah Horn and advised that he/she could make a purchase of methamphetamine from Todd MULLINS. SA Billy Keene was enlisted to act in an undercover capacity. The CI and Keene went to MULLINS' residence. The CS went into the residence and met with MULLINS. MULLINS advised the CS that he had very little to sell, but did have a bag with a small amount, between ½-1/4. MULLINS advised that he would sell the methamphetamine for \$50.00 and the transaction took place. Once the deal was done the CS left MULLINS and the CS and Keene traveled back to a staging location. Detective Horn took possession of the methamphetamine for safekeeping.

On June 14, 2017, Amy Mann was arrested in possession of methamphetamine and a handgun. A search of her cellular telephone revealed the following text messages:

**April 12, 2017**

Mann to Brandon WHITT, *"Todd jus called said he jus got eyes said hates to say anything but did u have a bag that weighed 5.7 cause thinks got bags switched and wanted to let u know but didn't know how to tell ya since hooked him up but so I will send u his number"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann advised Brandon WHITT that Todd MULLINS just obtained his scales ("eyes") and weighed the methamphetamine supplied by WHITT. I believe that Mann told WHITT that the two (2) bags of methamphetamine may have gotten switched and MULLINS was supposed to get the one that weighed 5.7 grams.

**April 26, 2017**

(276) 469-1215 (Todd MULLINS) to Mann, *"What do u want for half game"*

Mann to MULLINS, *"Hun I got some time on there for total of 6 seeing where other 4 went"*

(276) 285-7320 ("Cody Todd's Son") to Mann, *"Do you have anything? Work killed me and needed a little to help tomorrows work day pass easy"*

Mann to Cody, *"Your dad should have had some for u and him..."*

Mann to Cody, *"...he left here told me going to get rid of the last bit...tell him I come by in jus a bit to get that money"*

Based on my training and experience, and my knowledge of this investigation, I believe that Todd MULLINS inquired of Amy Mann how much money she wanted for 1/16 ounce of methamphetamine ("*half game*"). I believe that MULLINS' son Cody asked Mann for

methamphetamine, and she advised him that MULLINS should have had some for both of them and she would be by soon to pick up the drug proceeds from MULLINS.

**April 27, 2017**

Mann to (276) 469-1215 (Todd MULLINS), *"Hey have they got there yet??"*

MULLINS to Mann, *"They gave me a check. I'm gonna get money for you. I'm so sorry it happened this way. But you know I got you. Give me a big bit"*

Mann to MULLINS, *"Ok hun everyone jus wanting to know when I be good"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann inquired of Todd MULLINS if he had collected drug proceeds yet. I believe that MULLINS advised Mann that he had gotten a check, and he was going to get her the money. I believe that MULLINS asked Mann to set aside a *"big bit"* of methamphetamine for him.

**April 28, 2017**

Mann to (276) 469-1215 (Todd MULLINS), *"I coming your way Hun got stuff and need to flip some"*

MULLINS to Mann, *"I'm on parkway just got cash u want to meet"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann advised Todd MULLINS that she had methamphetamine and needed to sell some. I believe that MULLINS told Mann that he just got some more drug proceeds and wanted to meet with her.

**May 1, 2017**



Mann to (276) 469-1215 (Todd MULLINS), *"Could u please find me and Sky some pain"*

MULLINS to Mann, *"Yes"*

Mann to MULLINS, *"We both out would love u forever"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann inquired of Todd MULLINS if he could obtain pain medication for herself and Skyler SEBASTIAN (*"Sky"*). I believe that MULLINS told Mann that he would get her some.

On July 19, 2017, CS-15 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-15 stated that Todd MULLINS and others sold methamphetamine from his residence in Bristol, VA.

On July 20, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that when methamphetamine was transported into the Bristol area, it was divided up at several different locations, including the residence of Todd MULLINS and Robin Strickler.

On March 6, 2018, Joshua CHAPMAN was interviewed by law enforcement. CHAPMAN stated that he had obtained methamphetamine from Todd and Robin MULLINS. CHAPMAN described the MULLINS house as being a "Trap House" (house where illegal narcotics are sold).

According to the records of NCIC, Matthew Todd MULLINS was convicted of Possession of a Schedule IV Controlled Substance.

**Anthony Jerome HARLESS**

On February 13, 2013, Anthony HARLESS was arrested in Washington County, VA in possession of methamphetamine and items used in the manufacturing process of methamphetamine. HARLESS was eventually convicted of manufacturing methamphetamine and received a three (3) year sentence in Washington County, VA.

On November 23, 2015, Wendell Huskins was interviewed in Washington County, TN regarding his involvement in the distribution of methamphetamine between Atlanta, GA and Northeast Tennessee with Richard Alan Davis and Carrie Taylor. Huskins recognized a photograph of Anthony HARLESS and stated that HARLESS purchased methamphetamine from and sold methamphetamine to him.

On January 8, 2016, Richard Alan Davis was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Greeneville, TN. Davis stated that he met Anthony HARLESS in Atlanta, GA when HARLESS accompanied Carrie Taylor on a trip to pick up methamphetamine.

On March 25, 2016, Carrie Taylor was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. Taylor stated that she was a distributor of methamphetamine for Richard Alan Davis. Taylor stated that Anthony HARLESS sold methamphetamine for her in Abingdon, VA. Taylor stated that HARLESS sold "8 balls" (1/8 ounce) of methamphetamine at a time.

On July 12, 2017, Anthony HARLESS was interviewed pursuant to his arrest for possession of methamphetamine, Xanax, digital scales and additional drug paraphernalia. HARLESS stated that he had known Lacy WEIR for approximately three (3) years. HARLESS

stated that WEIR was originally from California. HARLESS stated that WEIR was pregnant with John Ratcliff's baby. HARLESS stated that WEIR introduced him to "Shawn" who was WEIR's uncle and also from California. HARLESS stated that WEIR told HARLESS that "Shawn" had methamphetamine imported from California, a few pounds at a time at least once a week.

HARLESS stated that he had received three (3) ounces of methamphetamine from WEIR that was provided by "Shawn". HARLESS stated that WEIR vouched for HARLESS with "Shawn", and "Shawn" began fronting methamphetamine to HARLESS for distribution. HARLESS stated that it began with four (4) ounces of methamphetamine, which HARLESS sold in a week. HARLESS stated that he paid "Shawn" back \$650.00 per ounce of methamphetamine. (Based on my knowledge of this investigation, and HARLESS' description of events, I believe that when referring to "Shawn", HARLESS was talking about Shawn FARRIS.)

On July 26, 2017, John Ratcliff was interviewed by law enforcement regarding his knowledge of drug trafficking in Northeast, TN and Southwest, VA. Ratcliff stated that Anthony HARLESS was a "punk" who was trying to sell heroin in the area.

On August 18, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that Anthony HARLESS was a methamphetamine distributor who was currently dating Tonni Mitchell.

According to the records of NCIC, Anthony Jerome HARLESS was arrested for Possession with Intent to Distribute a Schedule I or II drug in 2016 (VA). In 2017 HARLESS

was convicted of two (2) counts of Possession of a Schedule I or II controlled substance in Bristol, VA.

**Kimberly Ann DRAKE aka "*Momma Kim*", "*Mama Kim*", "*Ms. Kim*"**

On March 23, 2015, CS-38 was interviewed in Sullivan County, TN. CS-38 stated that she and others sold "gravel" (Alpha PVP – synthetic drug) for Kim DRAKE in Bristol.

On March 23, 2015, CS-39 was interviewed in Sullivan County, TN. CS-39 stated that she had purchased "gravel" (Alpha PVP) from Kim DRAKE. CS-39 stated that DRAKE lived on 24<sup>th</sup> St. in Bristol, TN.

On April 10, 2015, CS-40 was interviewed following her arrest in Johnson City, TN. CS-40 stated that Kim DRAKE was a distributor of "gravel" (Alpha PVP) who lived on 24<sup>th</sup> St. in Bristol, TN. CS-40 stated that DRAKE ordered packages of "gravel" and had them sent to her house, as well as a residence in Glade Spring, VA.

On April 13, 2015, CS-41 was interviewed in Washington County, TN. CS-41 stated that Kim DRAKE was a "dope" dealer in Bristol, TN.

On July 30, 2015, CS-42 was interviewed in Sullivan County, TN. CS-42 stated that Jerry Smith (previously indicted in the Eastern District of Tennessee in a related drug conspiracy) sold "gravel" for Kim DRAKE.

On February 17, 2016, CS-43 was interviewed in Washington County, TN. CS-43 stated that Kim DRAKE, aka "*Momma Kim*", was ordering packages of Alpha PVP from China and distributing it. CS-43 stated that DRAKE lived off of Anderson St. in Bristol, TN.

On April 1, 2016, CS-36 was interviewed in Sullivan County, TN. CS-36 stated that "*Mama Kim*" was supplying the area with "gravel". CS-36 stated that "*Mama Kim's*" daughter was Whitney Drake, who sold both methamphetamine and "gravel".

On May 25, 2016, CS-44 was interviewed in Sullivan County, TN. CS-44 stated that "*Momma Kim*" was using out of state addresses to receive shipments of Alpha PVP from China.

On June 10, 2016, CS-45 was interviewed in Kingsport, TN. CS-45 stated that "*Ms. Kim*" DRAKE received packages of Alpha PVP from China. CS-45 stated that "*Ms. Kim's*" daughter sold drugs for her mother.

On August 12, 2016, CS-46 was interviewed in Kingsport, TN. CS-46 stated that Kim DRAKE was still dealing in "gravel". CS-46 stated that DRAKE's daughter, Whitney Drake, was a distributor of "ice" (crystal methamphetamine).

On September 26, 2016, CS-47 was interviewed in Sullivan County, TN. CS-47 stated that she was purchasing "ice" (crystal methamphetamine) from several people, including Kim DRAKE, aka "*Momma Kim*" and her daughter, Whitney Drake.

On October 6, 2016, CS-48 was interviewed in Washington County, TN. CS-48 stated that "*Momma Kim*" DRAKE was receiving packages of "gravel". CS-48 stated that DRAKE supplied Jerry Smith with "gravel". CS-48 stated that DRAKE had a big safe in her house.

(In a related conspiracy indicted in the Eastern District of Tennessee, Jerry Smith was arrested on December 17, 2016 in Knoxville, TN in possession of approximately two (2) pounds of methamphetamine and a handgun. Smith was a distributor of methamphetamine for Joe Luther Sholtz, who was importing multiple kilograms of crystal methamphetamine from Georgia



into Knoxville, TN, and eventually much of it was distributed in Northeast Tennessee and Southwest Virginia.)

On January 10, 2017, a search warrant was applied for and obtained in the Eastern District of Tennessee for text message content stored in the accounts of telephone numbers (423) 702-1934 (Joe Luther Sholtz). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from December 22, 2016 to January 10, 2017. The following is an excerpt from the search warrant results:

**January 1, 2017**

(423) 534-7929 (Kimberly DRAKE) to Joe Sholtz, *"Sorry this is Kim just seen ur messages on other phone just got off phone with Jerry... he said he has already spoke with someone about pretrial release..."*

SHOLTZ to DRAKE, *"They got you money right"*

DRAKE to Sholtz, *"Yes they did and thank you very much"*

Based on my training and experience, and my knowledge of this investigation, I believe that Kimberly DRAKE contacted Joe Sholtz to obtain money for Jerry Smith's bond.

**January 2, 2017**

DRAKE to SHOLTZ, *"I just had a friend stop by to see what you up with Jerry ot if I had heard from me this friend is from here but has a brother that works in Knoxville he is a cop he called his brother asking if he knew a Jerry Smith from here and tokd by buddy that theu had arrested him and about the federal detainer said a female had called and turned them in just thought yiud want to know that sorry to bother you"*

SHOLTZ to DRAKE, *"No bother tks I knew she the one. Your cop friend work Knox"*

DRAKE to Sholtz, *"I don't know the cop, but yes he works and lives in Knoxville, the one I knkw lives here. There are brothers but jist know the one living her"*

Sholtz to DRAKE, *"Well I need a paid friend here if he knowdwho can help you know"*

DRAKE to Sholtz, *"I talk to the one here, also I was in the federal half way house in 2010 and met a few ppl there and have stay in touch with some I see what I can find"*

Based on my training and experience, and my knowledge of this investigation, I believe that Kimberly DRAKE contacted Joe Sholtz to advise him that she had information from a police officer in Knoxville that Jerry Smith had been set up by a female. I believe that Sholtz asked DRAKE if she could put him in touch with the officer as he needed someone he could pay for information. I believe that DRAKE advised Sholtz that she had previously been in the federal system and would try to find him a contact.

**January 6, 2017**

Sholtz to DRAKE, *"Bring me what money I take care it"*

DRAKE to Sholtz, *"I can leave in the next few bring u all I have and aint afraid of work if that will help giving u everything back"*

Sholtz to DRAKE, *"I need you to work for me"*

DRAKE to Sholtz, *"...if ur friend has work for me to do I can go met him get what u say and make my move and cline back to u"*

Based on my training and experience, and my knowledge of this investigation, I believe that Kimberly DRAKE offered to sell methamphetamine (*"ain't afraid of work"*) for Joe Sholtz to pay him back for Jerry Smith's bond. I believe that SHOLTZ advised DRAKE that he wanted her to sell methamphetamine (*"work"*) for him.

**January 8, 2017**

DRAKE to Sholtz, *"Everyone is getting laid off here I've got to go to work I can start asap if u know of any jobs I'm not lazy and a hardworker"*

Based on my training and experience, and my knowledge of this investigation, I believe that Kimberly DRAKE advised Joe Sholtz that she was ready to sell methamphetamine for him (*"I've got to go to work"*).

On January 26, 2017, CS-17 was interviewed in Johnson City, TN. CS-17 stated that Kim DRAKE was a methamphetamine distributor for Ace Rose. CS-17 stated that DRAKE also sold "gravel". CS-17 stated that DRAKE's daughter, Whitney Drake, used to purchase methamphetamine from CS-17 and Jerry Smith.

On February 6, 2017, Brandon Thorpe was interviewed in Anderson County, TN. Thorpe stated that *"Mama Kim"*, Whitney Drake's mother, was attempting to obtain crystal methamphetamine through him.

On February 10, 2017, Thorpe was interviewed again in Sullivan County, TN. Thorpe listed many distributors for the methamphetamine trafficking organization for whom he worked, including *"Momma Kim"*, who was the mother of Whitney Drake.

On March 23, 2017, CS-27 was interviewed in Abingdon, VA. CS-27 stated that he was with Larry Addair the night before his murder. CS-27 stated that he picked up Addair at the residence of "*Mama Kim*" on 23<sup>rd</sup> St. in Bristol, TN. CS-27 stated that Addair had a huge bag of "ice" (crystal methamphetamine), \$50,000.00 and nine (9) pistols.

On June 14, 2017, Amy Mann was arrested in possession of methamphetamine and firearms. Pursuant to her arrest, Mann stated that the most methamphetamine she ever had in her house was ½ pound. Mann stated that the ½ pound of methamphetamine was eight (8) ounces in block form, at her house last week.

A search of Mann's cellular telephone revealed the following text messages with telephone numbers (423) 217-2481 (saved under "*Moma Kim*") and (423) 366-6126 (saved under "*Moma Kim New*"):

**April 20, 2017**

DRAKE to Mann, "*Omg I just hung up on Bill didn't mean to r u still talking to him*"

Mann to DRAKE, "*No Hun they are in lock down*"

DRAKE to Mann, "*U know anything good?*"

Mann to DRAKE, "*What ya need??*"

DRAKE to Mann, "*I need ice cream*"

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann and Kim DRAKE discussed talking to Bill Taylor in jail (Taylor was previously

indicted in the Eastern District of Tennessee in a related drug conspiracy). I believe that DRAKE then ordered crystal methamphetamine (*"ice cream"*) from Mann.

**May 7, 2017**

DRAKE to Mann, *"Ok can't text it's Kim call me real quick if u can please heard u may have something I need thanks baby"*

DRAKE to Mann, *"U make it back"*

Mann to DRAKE, *"Not yet working on it but know where mofo went"*

DRAKE to Mann, *"Is he on Island Rd"*

Mann to DRAKE, *"No he made it back he trying to hurry get licensed driver and come back to me"*

DRAKE to Mann, *"I got license do u need me to come and get u"*

Mann to DRAKE, *"No we got out but he got my car and I in the new one so we cool let u know when back making big order for everyone now"*

DRAKE to Mann, *"K"*

DRAKE to Mann, *"Is this tire for you Amy or someone else"*

Mann to DRAKE, *"Someone else I can't got kids tonight"*

DRAKE to Mann, *"I don't care to help anybody but the person who needs the tire owes me a lot"*



DRAKE to Mann, *"I'm gonna send this tire but I'd appreciate if you'd pass the message on to Craig, that is said he is welcome, and I'd appreciate if he keep he word and if ever call him (which I doubt I will) be a man and not some bull shitter"*

DRAKE to Mann, *"But Mohawk hasn't gotten he just"*

Mann to DRAKE, *"Mohawk never showed and I can pass message to him idk if we going that route tho! That odd he should have already been to your house by now"*

DRAKE to Mann, *"Tell Mohawk sorry I didn't mean to cause him to get the run around but it put me in a lil shock when I heard who it was for, just cuz how he has been acting since he owes me, but hell that ain't no reason sorry Amy didn't mean to slow ur moves either, I have no problem with you think ur a sweetheart love Mohawk to death and at one didn't have any doubt about handing Craig whatever, but anyway tire is here I've got peep here from Greenville that's been here for hours, gotta get something done just let me know k"*

Mann to DRAKE, *"I feel ya jus have personal helped everyone out today since they all out or would help ya!! Thanks I tell everyone the same about ya always did me right and offered help when didn't have to!! I feel ya about people owing money idk anyone out this group that don't owe me so I hear ya"*

DRAKE to Mann, *"I don't concerned myself any part of this or that group, and there is even one or two that I may owe, but if I minus what they owes me and forgot about we'd be even or they would still owe, a lot it's just chalk to the game, I just don't get when you helped and helped someone and you ask if they know anything (not asking for anything they owe you, just to get something they lie, cuz they afraid you will ask for what they*

*owed you, but anyway I'm gonna tell them there isn't gonna be nothing cuz it's late and they've been here for a couple hours, hell was trying to help a buddy and make a dollar"*

DRAKE to Mann, *"Mohawk just got tire baby"*

Based on my training and experience, and my knowledge of this investigation, I believe that Kim DRAKE ordered "spackle" (synthetic drug) from Amy Mann, who was making a large order to be picked up by Timothy Barry Hall (aka "Mohawk", previously indicted in the Eastern District of Tennessee in a related drug conspiracy). I believe that Mann asked DRAKE to supply "Mohawk" with methamphetamine ("tire"), which she did but not before advising Mann that "Mohawk" owed her money. I believe that DRAKE had drug customers from Greeneville, TN waiting at her residence for the "spackle".

**May 13, 2017**

DRAKE to Mann, *"Amy please push Terry out the door if he is still there"*

**June 4, 2017**

DRAKE to Mann, *"Hey baby sorry to bug u it's Kim do u know anything"*

**June 6, 2017**

DRAKE to Mann, *"8 sounds good if u hear of any spak please call me"*

Mann to DRAKE, *"I working on that now too"*

DRAKE to Mann, *"Please call me if u do what about the other got a couple gone"*

Mann to DRAKE, *"Ok u know I will or let me know if u change your mind"*

DRAKE to Mann, *"I won't LOL"*

DRAKE to Mann, *"...I'll never change my not on spackle"*

Based on my training and experience, and my knowledge of this investigation, I believe that Kim DRAKE ordered "spackle" (*"spak"*) from Amy Mann, and advised Mann that she already had some methamphetamine sold and needed some (*"what about the other got a couple gone"*).

**June 7, 2017**

Mann to DRAKE, *"I good on cream working on other dayight"*

DRAKE to Mann, *"Price in that"*

DRAKE to Mann, *"Hey send me a price baby I got some gone, I can get it that for 7 but somebody ain't wanting to wait"*

DRAKE to Mann, *"I'm on my way to ur house"*

Mann to DRAKE, *"So JDawg said he got ya for me"*

DRAKE to Mann, *"I did get one need 2 more I'm tripping balls right now ask Jay what he told me about someone I would have laid down and died for omg"*

DRAKE to Mann, *"I need spackle spackle"*

Mann to DRAKE, *"It on way to me"*

DRAKE to Mann, *"Spackle is omg I love u to death!!!"*

DRAKE to Mann, *"Spackle make it there"*

Mann to DRAKE, *"Yea give me few"*

DRAKE to Mann, *"Depending on price I want 2 if u have em"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann advised Kim DRAKE that she had methamphetamine (*"cream"*) and was still working on getting *"spackle"*. I believe that DRAKE advised Mann that she could get methamphetamine from someone else at \$700.00 per ounce. I believe that DRAKE was supplied an ounce of methamphetamine by Jason Clements (aka *"JDawg"*, aka *"Jay"*, previously indicted in the Eastern District of Tennessee in a related drug conspiracy), but wanted two (2) additional ounces from Mann. I believe that eventually, DRAKE was supplied *"spackle"* by Mann.

**June 10, 2017**

DRAKE to Mann, *"I'm gonna have to go to Dairy Queen and get some ice cream"*

**June 11, 2017**

DRAKE to Mann, *"I found it in can get I need Terry asap"*

Mann to DRAKE, *"My dude on bike tell him on way to me I need to meet him or have him bring that to me now"*

DRAKE to Mann, *"He is but he is ain't Amy if they came to u with a bunch of money please let me know I got like 4000 gone"*

Mann to DRAKE, *"Yea Thorpe has 5,250 of mine so trust me I would"*

Mann to DRAKE, *"He not w u??"*

DRAKE to Mann, *"No we went separate ways I just told him to call u Thorpe is talking to me so I'll help u"*

Mann to DRAKE, *"If u help get my money back I'll give u a nice chunk and help ya w spac this week"*

DRAKE to Mann, *"...I had some body wanting 2 and another quarter but I can't cover it, now"*

Based on my training and experience, and my knowledge of this investigation, I believe that Kim DRAKE advised Amy Mann that she had obtained methamphetamine (*"ice cream"*) and needed Terry DALTON to help her sell it. I believe that later, DRAKE advised Mann that \$4,000.00 in drug proceeds had been stolen from her. I believe that Mann told DRAKE that Brandon Thorpe (previously indicted in the Eastern District of Tennessee in a related drug conspiracy) owed her \$5,250.00 in drug proceeds. I believe that Mann told DRAKE that if she helped Mann get her money, Mann would give a chunk of methamphetamine and some *"spackle"* (*"spac"*) to DRAKE. I believe that DRAKE told Mann that she had a drug customer ordering 2¼ ounces of methamphetamine but she couldn't afford to get it since the money was taken.

On July 20, 2017, Amy Mann was interviewed as the result of a proffer agreement entered into with the U.S. Attorney's Office in the Western District of Virginia. Mann stated that the week before her arrest, Shawn FARRIS dropped off ½ pound of crystal methamphetamine at her residence. Mann stated that this methamphetamine was picked up by Brandon Thorpe, who still owed Mann \$5,000.00 for the methamphetamine. In a subsequent



interview, Mann stated that "*Mama Kim*" was a distributor of "spackle" who lived on 24<sup>th</sup> Street in Bristol, TN.

Your affiant believes that the text messages between Amy Mann and Kim DRAKE from June 6 to June 11, 2018, contained herein, referred to the methamphetamine supplied by Shawn FARRIS and distributed by Brandon Thorpe and Terry DALTON.

On March 6, 2018, Joshua CHAPMAN was interviewed in Sullivan County, TN. CHAPMAN stated that he had distributed "gravel" purchased from Jason in Carter County, TN. CHAPMAN stated that Jason worked with "*Mama Kim*" selling "gravel". CHAPMAN stated that "*Mama Kim*" lived on 24<sup>th</sup> St., in Bristol, TN with two (2) daughters.

According to the records of NCIC, Kimberly Ann DRAKE was convicted in the Western District of Virginia in 2006 for Conspiracy to Distribute Crack Cocaine. In 2007, DRAKE was convicted for Manufacture/Sale/Possession of a Controlled Substance.

#### **Brandon Heath WHITT**

On September 13, 2016, officers responded to a domestic disturbance at 2105 Anderson St., Bristol, TN. Officers identified Brandon WHITT and two females at the residence inside a vehicle. Pursuant to a search of the vehicle, methamphetamine residue, plastic baggies and other paraphernalia was seized. WHITT and one of the females was charged with possession of drug paraphernalia.

On November 8, 2016, officers encountered Brandon WHITT in a vehicle in a Food City parking lot in Bristol, TN. Pursuant to a search of the vehicle, officers seized two (2) dosage units of oxycodone, one (1) dosage unit of Clonazepam, drug paraphernalia and two (2)

handguns. From WHITT's person officers seized an unknown white powdery substance. WHITT was charged with possession of a Schedule II drug, Schedule IV drug, firearm and drug paraphernalia. When getting booked into the Sullivan County Jail, officers found a crystal like substance on WHITT's person and he was charged with Introduction into a Penal Facility.

On January 12, 2017, CS-11 was interviewed in Marion, VA. CS-11 provided information on several methamphetamine distributors known to law enforcement, including Jeremy Olinger. CS-11 stated that after Olinger's arrest, Levi BENNETT and others were supplied methamphetamine by Joe and Brandon WHITT.

On January 18, 2017, CS-12 was interviewed in Abingdon, VA. CS-12 stated that she had been using methamphetamine since 2009. CS-12 names several methamphetamine distributors from whom she purchased methamphetamine, including the WHITT brothers, Joe and Brandon. CS-12 stated that she purchased "8 balls" (1/8 ounce) of methamphetamine from Brandon WHITT for \$200.00 to \$225.00. CS-12 stated that she and Levi BENNETT rode with WHITT to obtain methamphetamine from his source at exit 19 in Abingdon, VA.

On January 31, 2017, a traffic stop was conducted in Sullivan County, TN on a vehicle operated by Brandon WHITT. Pursuant to a search of WHITT, a small amount of methamphetamine and drug paraphernalia was seized. WHITT was charged with DUI, possession of a Schedule II drug, and possession of drug paraphernalia.

On February 13, 2017, a traffic stop was conducted in Bristol, TN on a vehicle operated by Brandon WHITT and occupied by Christopher Reynolds (subsequently indicted in the Eastern District of Tennessee in a related conspiracy). Pursuant to a search of the vehicle, small amounts

of methamphetamine, digital scales, and drug paraphernalia were seized. WHITT was arrested and charged with possession of methamphetamine and paraphernalia.

On February 22, 2017, Todd MULLINS was interviewed in Bristol, VA. MULLINS stated that Joe and Brandon WHITT were brothers and big methamphetamine dealers. MULLINS stated that he had recently seen Joe Whitt in possession of three (3) kilograms of methamphetamine.

On March 23, 2017, CS-27 was interviewed in Abingdon, VA. CS-27 provided information on many methamphetamine distributors in Southwest Virginia and Northeast Tennessee. CS-27 identified Brandon WHITT was one of these methamphetamine distributors.

On April 20, 2017, CS-30 was interviewed in Abingdon, VA. CS-30 provided information on many known methamphetamine distributors in Southwest Virginia. CS-30 stated that Joe and Brandon WHITT were suppliers of methamphetamine to many of these distributors.

On May 6, 2017, Jerrod Garrison was arrested in Kingsport, TN in possession of approximately six (6) ounces of crystal methamphetamine and \$1,527.00 U.S. Currency. Pursuant to a search warrant on Garrison's cellular telephone (423-732-1804), agents found telephone number (423-341-9369) saved under "Brandon". (The same phone number was saved in the cell phone of John Ratcliff under "Brandon Whitt".) The following text messages between Garrison and Brandon WHITT were contained on the phone:

**April 28, 2017**

WHITT to Garrison, *"I need a bunch. An you help"*

Garrison to WHITT, *"What's going on man"*

WHITT to Garrison, *"I can find some"*

Garrison to WHITT, *"I'm needing help me find something"*

WHITT to Garrison, *"How much brother man? I have some but mostly peronal. Can get a zip or two for sure"*

Garrison to WHITT, *"Lb"*

Garrison to WHITT, *"Where you at least I'll get something from you"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT contacted Jerrod Garrison to obtain a large amount of methamphetamine (*"I need a bunch"*). I believe that Garrison advised WHITT that he didn't have any methamphetamine and needed a pound (*"lb"*), and WHITT offered to get Garrison an ounce or two.

**April 29, 2017**

WHITT to Garrison, *"Found a half a lb"*

Garrison to WHITT, *"How much"*

Garrison to WHITT, *"Where u at"*

WHITT to Garrison, *"I'm in Bristol. Out beniums"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT advised Jerrod Garrison that he found ½ pound of methamphetamine (*"half a lb"*) for Garrison and was on Benhams Road in Bristol, VA.

**April 30, 2017**

WHITT to Garrison, *"Hey bro what's up. I need if u can"*

WHITT to Garrison, *"I have a trip planned. You coming?"*

WHITT to Garrison, *"Can get your lb 3½"*

Garrison to WHITT, *"I will be good tonight"*

WHITT to Garrison, *"If not bro I got you. We can go to WVA and get it for 7500"*

WHITT to Garrison, *"Maybe 8 but no more than"*

Garrison to WHITT, *"My guy is back"*

WHITT to Garrison, *"Hello yeah. I need to see ya"*

WHITT to Garrison, *"Just same me about 2/3/4 wholes. Please if possible"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT advised Jerrod Garrison that he was going to make a trip to West Virginia to obtain methamphetamine, and could get a pound of methamphetamine for \$7,500.00 or \$8,000.00 at the most. I believe that Garrison advised WHITT that his source of supply was back with methamphetamine, and WHITT ordered two (2), three (3) or four (4) ounces from Garrison.

**May 2, 2017**

WHITT to Garrison, *"Hey bro. I'm getting asked if I can do a lb"*



Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT check with Jerrod Garrison to see if there was a pound of methamphetamine available.

**May 3, 2017**

WHITT to Garrison, *"I can get you a half a p for 475"*

Garrison to WHITT, *"Any good"*

WHITT to Garrison, *"Yeah man"*

WHITT to Garrison, *"Maybe a whole but not sure if they have whole. It's 95 if they do"*

Garrison to WHITT, *"Get it I will be n Bristol n a hour n a half"*

WHITT to Garrison, *"Ok. I'll make it happen brother. Not to many people I would do it for. U want half or whole"*

Garrison to WHITT, *"Half if it ant what she had last time"*

WHITT to Garrison, *"Totally different"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT advised Jerrod Garrison that WHITT could get ½ pound of methamphetamine for \$4,750.00, and maybe a whole pound for \$9,500.00.

**May 4, 2017**

WHITT to Garrison, *"Hey I'm good. Have a couple lined up for sure for you"*

Garrison to WHITT, *"K I will call u when I hit town"*

WHITT to Garrison, "*What up*"

Garrison to WHITT, "*Morristown driving slow because of the rain but I am coming tonight bro I promise you*"

WHITT to Garrison, "*Ok. Thanks man. See you soon. Be safe.*"

WHITT to Garrison, "*Can you do like 8 at a better price*"

Garrison to WHITT, "*5000*"

WHITT to Garrison, "*Where can I meet ya*"

Garrison to WHITT, "*Airport exit*"

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT contacted Jerrod Garrison to advise him that WHITT had methamphetamine customers lined up. I believe that Garrison advised WHITT that he was on his way back from picking up and was still in Morristown. I believe that Garrison agreed to sell 8 ounces of methamphetamine to WHITT for \$5,000.00.

**May 5, 2017**

WHITT to Garrison, "*Where can I meet you.*"

WHITT to Garrison, "*I can do a q maybe 6*"

Garrison to WHITT, "*Airport exit*"

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT contacted Jerrod Garrison to order ¼ pound (4 ounces) or six (6) ounces of methamphetamine.

On June 1, 2017, CS-3 was interviewed in Bristol, VA. CS-3 stated that she sold methamphetamine for Shawn FARRIS. CS-3 stated that others from whom she purchased methamphetamine included Joe and Brandon WHITT, Terry DALTON, Heather Ashley DAVIS, Gary MCFARLANE, Amy McFarlane (Mann), Barry Hall aka "Mohawk", and Johnny Farner.

On June 14, 2017, Amy Mann was arrested in possession of methamphetamine and a handgun. A search of her cellular telephone revealed the following text messages with telephone number (423) 341-9369, saved under "Brandon":

**April 2, 2017**

Mann to WHITT, *"Hey did u happen to remember seeing a bag of pills at my house this morning we can't find them"*

WHITT to Mann, *"No honey u only had that one in the crusher. I never seen the bag of them"*

Mann to WHITT, *"Hey I have to have some for Bill tonight"*

WHITT to Mann, *"I got you."*

WHITT to Mann, *"Tonight?"*

Mann to WHITT, *"Yea I don't want to do this but he says full proof to get to him so need at least half ball for him have gravel coming too from Kevin"*

Mann to WHITT, *"I have to be there at 9"*

WHITT to Mann, *"Be where"*

Mann to WHITT, *"To drop stuff for Bill strips and ice and gravel"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann inquired of Brandon WHITT if he knew where her pain pills were. I believe that Mann ordered methamphetamine from WHITT who agreed to have it for her (*"I got you"*). I believe that Mann advised WHITT that she was going to sneak Suboxone strips (*"strips"*), methamphetamine (*"ice"*), and Alpha PVP (*"gravel"*) into the Abingdon Regional Jail where Bill Taylor was being held. (Taylor was indicted in the Eastern District of Tennessee for Possession with the intent to distribute methamphetamine, and possession of a firearm in furtherance of a drug trafficking crime).

**April 3, 2017**

WHITT to Mann, *"...I might need some on that if you an honey. I need it to re and I'll get you back."*

WHITT to Mann, *"Can you meet us"*

Mann to WHITT, *"Yea that fine meet who?"*

WHITT to Mann, *"Terry and me"*

Mann to WHITT, *"How much did ya need"*

WHITT to Mann, *"Need help lmk. And 120 and I'll give you and half g back and some later too."*

(Several hours later)

WHITT to Mann, *"Just got good."*

Mann to WHITT, *"All OK want to meet out or can meet ya and go to my house"*

Mann to WHITT, *"I dropping Gary and Todd off at his house then heading to house for few if want to meet there"*

WHITT to Mann, *"Ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT asked Amy Mann for money so that he and Terry DALTON could obtain additional methamphetamine (*"re"* – short for re-up). I believe that WHITT offered to pay her back and give her ½ gram of methamphetamine (*"half g"*) for letting him borrow the money. I believe that WHITT advised Mann when he had obtained the methamphetamine (*"Just got good"*) and Mann agreed to meet with him after she dropped off Gary MCFARLANE and Todd MULLINS.

**April 4, 2017**

Mann to WHITT, *"Hey how much quarter and half"*

Mann to WHITT, *"Can u quote me some prices"*

WHITT to Mann, *"Can I stop by"*

Mann to WHITT, *"Yea"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann inquired of Brandon WHITT how much it would cost for ¼ ounce and ½ ounce of methamphetamine.

**April 5, 2017**

WHITT to Mann, *"I need a place to hide someone. Like where people don't see them. Know anywhere"*

Mann to WHITT, *"Are they a thief"*

WHITT to Mann, *"Call my cell and no... they are very close to me."*

WHITT to Mann, *"It's my brother."*

WHITT to Mann, *"Know anyone needing lmk"*

WHITT to Mann, *"Hey I need a car badly. Can I rent one tonight. Need to ft"*

WHITT to Mann, *"Might need that place for a day or two."*

Mann to WHITT, *"Ok jus come by and see me around 9:30 should be home but I will call or text ya and can meet me there are u good for couple other people"*

WHITT to Mann, *"Yeah I'm real good"*

Mann to WHITT, *"Ok hun"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT inquired of Amy Mann if she knew of anywhere he could hide his brother (Paul Joseph Whitt – subsequently indicted in the Eastern District of Tennessee in a related



conspiracy), for whom there was a warrant. I believe that WHITT asked Mann if she had any customers needing methamphetamine because he had just obtained some (*"I'm real good"*).

**April 7, 2017**

Mann to WHITT, *"I sold another o and plus half in k town"*

Mann to WHITT, *"Have a ton gone but need my wheels and have ?? for ya"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann advised Brandon WHITT that she just sold another ounce of methamphetamine (*"o"*), and that she had much more sold but needed her car (*"wheels"*) to deliver it.

**April 8, 2017**

Mann to WHITT, *"Please make sure Bills packages in car"*

Mann to WHITT, *"That a lot of money"*

Mann to WHITT, *"Do u have ball on ya for someone"*

WHITT to Mann, *"Yes."*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann asked Brandon WHITT to make sure a package of drugs for Bill Taylor was still in her car. I believe that Mann inquired of WHITT if he had 1/8 ounce of methamphetamine (*"ball"*) for her to sell, to which he responded in the affirmative.

**April 9, 2017**

WHITT to Mann, *"Can you take care of Cody please."*

WHITT to Mann, *"1¼ to him but he's gotta leave what he owes"*

Mann to WHITT, *"I know that I already got 560 tho and jus started"*

WHITT to Mann, *"Hell yeah. Is that counting the 200 I left or no"*

Mann to WHITT, *"Well yea but I awake now lol and your girl running up to Marion hun"*

Mann to WHITT, *"Want me to ask her to stay going to get rid of balls"*

WHITT to Mann, *"If you feel comfortable Deanna needs a game on front street around daylight"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT directed Amy Mann to sell 1¼ ounces of methamphetamine to Cody Blevins and to make him pay what he already owed. I believe that Mann and WHITT discussed amounts of drug proceeds, and sending a female to Marion, VA to sell 1/8 ounce quantities of methamphetamine (*"balls"*).

**April 10, 2017**

Mann to WHITT, *"Hey Terry wants 2 on front told him had to pay down \$200.00 but only one at a time on front and has to be today"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann advised Brandon WHITT that Terry DALTON wanted two (2) ounces fronted to him, but Mann told DALTON that he could only have one (1) at a time if he left \$200.00 as a down payment.

**April 11, 2017**

Mann to WHITT, *"Hey need whole instead of half now is that here"*

Based on my training and experience, and my knowledge of this investigation, I believe that Amy Mann inquired of Brandon WHITT if he had left a whole ounce of methamphetamine at her house.

**April 12, 2017**

WHITT to Mann, *"Well you don't have to send anything by Bob. Is he there. I really need that money from anything he got done. I am with her now and I need about 4-450 more to get what we need"*

Mann to WHITT, *"Well will send money w him when he gets here"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandon WHITT advised Amy Mann that he was with a source of supply for methamphetamine (*"her"*) and needed another \$400.00 to \$450.00 to obtain a certain amount of methamphetamine.

On July 20, 2017, CS-4 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-4 stated that *"Georgia"* was a black female who sold methamphetamine for Shawn FARRIS. CS-4 stated that people who sold methamphetamine for *"Georgia"* were Heather Ashley DAVIS, Brandon WHITT and Terry DALTON.

According to the records of NCIC, Brandon Heath WHITT was arrested in Virginia in 2016 for Possession With Intent to Distribute Schedule I or II Controlled Substance and two (2)

counts of Possession of a Controlled Substance. Also in 2016, WHITT was charged with Possession of a Schedule II and IV Controlled Substance in Tennessee.

**Melissa Darlene BARRETT**

On December 16, 2016, CS-22 was interviewed pursuant to her arrest for conspiracy to distribute methamphetamine in the Western District of Virginia. CS-22 stated that she was a methamphetamine user who sold small amounts to support her habit. CS-22 stated that she obtained methamphetamine from Jeremy Bartley, Dawn Vincente, Susan PAYNE and Darlene BARRETT. CS-22 stated that she purchased methamphetamine from BARRETT on 20 to 30 occasions.

On June 7, 2017, CS-8 was interviewed by law enforcement following her arrest for possession with intent to distribute methamphetamine. CS-8 stated that she was a methamphetamine distributor for Darlene BARRETT. CS-8 advised that she obtained one (1) ounce of methamphetamine from BARRETT every two (2) to three (3) days for \$1,000.00. CS-8 advised that BARRETT had been one of her methamphetamine sources of supply since January or February, 2017.

On June 23, 2017, a Confidential Source (CS) working with the Washington County, Virginia Sheriff's Office (WCSO) made a controlled purchase of methamphetamine from Darlene BARRETT. The CS and CS vehicle were searched before and after the purchase and no illegal substances were found in either place. The CS was provided United States currency by the WCSO for the purchase. The CS was visually and electronically monitored from the staging location to BARRETT's residence located at 240 Campbell Street Abingdon, Virginia. The CS met with BARRETT and purchased one (1) gram of methamphetamine from BARRETT for

\$120.00. Once the deal was complete the CS met with agents from the WCSO at a staging location. The methamphetamine was turned over Detective Noah Horn.

On June 27, 2017, a CS working with the WCSO met with agents at a staging location. The CS and CS vehicle was searched and no illegal substances were found in either place. The CS was provided United States currency by the WCSO. The CS was then visually and electronically monitored from the staging location to BARRETT'S residence located at 240 Campbell Street Abingdon, Virginia. The CS met with BARRETT and purchased one (1) gram of methamphetamine for \$120.00 and ¼ gram of cocaine for \$20.00. Once the transaction was completed the CS traveled back to the staging location. The CS turned over the methamphetamine and cocaine to Detective Horn.

On June 29, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 591-7287 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from June 20 to June 29, 2017. The following is an excerpt from the search warrant results:

**June 20, 2017**

(276) 274-6648 (Darlene BARRETT) to FARRIS, "*What's up*"

BARRETT to FARRIS, "*Can I come see u*"

Based on my training and experience, and my knowledge of this investigation, I believe that Darlene BARRETT contacted Shawn FARRIS in an attempt to obtain methamphetamine.

On July 26, 2017, John Ratcliff was arrested for possession of 1.3 kilograms of crystal methamphetamine and a gun. Saved under "*Darlene*" in Ratcliff's phone was telephone number (276) 274-6648, a known telephone number for Darlene BARRETT.

A search of the text messages stored on the cellular telephone of Ratcliff revealed the following conversations:

**July 2, 2017**

Ratcliff to (423) 341-8784 ("*Cash*"), "*Just wanted u to know I made it glad nobody came I got rained out n stuck here in GA*"

Ratcliff to (276) 274-6648 (Darlene BARRETT), "*I got rained out girl I had to get a room my cloths are soaked. But I am gonna be there first thing tomorrow*"

BARRETT to Ratcliff, "*Fuck. How far*"

Ratcliff to BARRETT, "*I'm 4 hrs away*"

BARRETT to Ratcliff, "*If your not back I'm going have to go somewhere else so let me know*"

Ratcliff to BARRETT, "*O bike now*"

BARRETT to Ratcliff, "*How long I'm being drove craxy*"

Ratcliff to BARRETT, "*Greenville NC now*"

BARRETT to Ratcliff, "*Where uh now or I have to get other they driving me crazy*"

BARRETT to Ratcliff, "*Need 3 or 4*"

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff notified Darlene BARRETT that he was still four (4) hours away. I believe that BARRETT told Ratcliff that she needed three (3) or four (4) ounces of methamphetamine.

**July 4, 2017**

(276) 274-6648 (Darlene BARRETT) to Ratcliff, "*What's up now*"

Ratcliff to BARRETT, "*Now shit*"



BARRETT to Ratcliff, "*4. Need 4*"

Based on my training and experience, and my knowledge of this investigation, I believe that Darlene BARRETT ordered four (4) ounces of methamphetamine from John Ratcliff.

**July 7, 2017**

Ratcliff to (276) 274-6648 (Darlene BARRETT), "*I want u to know it came through. The other*"

BARRETT to Ratcliff, "*Yes*"

Ratcliff to BARRETT, "*Lol figured u would like to hear that lol*"

Ratcliff to BARRETT, "*Just let me know lol*"

BARRETT to Ratcliff, "*Can u meet me this way*"

Ratcliff to BARRETT, "*Yes if need be. What's ur number?*"

BARRETT to Ratcliff, "*I*"

BARRETT to Ratcliff, "*Exit 5 or 7*"

Ratcliff to BARRETT, "*5*"

BARRETT to Ratcliff, "*Now*"

Ratcliff to BARRETT, "*Exxon*"

BARRETT to Ratcliff, "*Ok I'm leaving now*"

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff contacted Darlene BARRETT to advise her that the methamphetamine had been delivered. I believe that BARRETT ordered one (1) ounce of methamphetamine and they agreed to meet at the Exxon station located at exit 5 in Bristol, VA.

**July 20, 2017**

Ratcliff to (276) 274-6648 (Darlene BARRETT), "*Do u need to see me today?*"

BARRETT to Ratcliff, *"Be down in about hour and half"*

Ratcliff to BARRETT, *"O ok that's fine I just didn't want to leave u hanging"*

Based on my training and experience, and my knowledge of this investigation, I believe that John Ratcliff checked with Darlene BARRETT to see if she needed methamphetamine. I believe that BARRETT advised Ratcliff that she would be down to see him.

On August 9, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone numbers (276) 206-0158 (Donald Zachary SNYDER) and (276) 274-6648 (Darlene BARRETT). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from July 25 to August 1, 2017. The following is an excerpt from the search warrant results:

**July 25, 2017**

Shawn FARRIS to Darlene BARRETT, *"Come on"*

FARRIS to BARRETT, *"I be out side"*

Based on my training and experience, and my knowledge of this investigation, I believe that Shawn FARRIS contacted Darlene BARRETT to tell her that he had methamphetamine for her and to come pick it up at his residence, which at the time was 600 Garden Ln., Bristol, VA.

Darlene BARRETT to (276) 206-0368 (Bradley WILLIAMS), *"When u bringing the rest"*

WILLIAMS to BARRETT, *"As soon as I get it. I promise it won't be long."*

BARRETT to WILLIAMS, *"U need to come on now Brad"*

BARRETT to WILLIAMS, *"I need that"*

WILLIAMS to BARRETT, *"I'm waiting on a ride. You do me a q until y'all get back?"*

Based on my training and experience, and my knowledge of this investigation, I believe that Darlene BARRETT contacted Bradley WILLIAMS to collect drug proceeds. I believe that WILLIAMS advised that he was still collecting, and asked BARRETT to give him a ¼ ounce of methamphetamine ("q") to last him until BARRETT returned from a trip.

**July 27, 2017**

(276) 206-0368 (Bradley WILLIAMS) to Darlene BARRETT, *"Hey, I bout got you together. Can you get a couple"*

BARRETT to WILLIAMS, *"Don't have the money but need to go now"*

BARRETT to WILLIAMS, *"Before I go to Dougs"*

WILLIAMS to BARRETT, *"You going down right now? I got the money"*

BARRETT to WILLIAMS, *"Yes"*

WILLIAMS to BARRETT, *"Just go ahead then. If you can get me one I would appreciate it. I have your money though. I just can't get it to you right now"*

BARRETT to WILLIAMS, *"Can I come to you"*

BARRETT to WILLIAMS, *"Need it"*

BARRETT to Shawn FARRIS, *"Can I come by"*

FARRIS to BARRETT, *"30 minutes"*

BARRETT to WILLIAMS, *"Have to go in 30"*

Based on my training and experience, and my knowledge of this investigation, I believe that Bradley WILLIAMS contacted Darlene BARRETT to advise her that he had drug proceeds to pay to her, and to inquire if she could get him a couple more ounces of methamphetamine. I believe that BARRETT in turn contacted Shawn FARRIS, who told her to come get the methamphetamine in 30 minutes.

On August 30, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 791-6721 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from August 19 to August 25, 2017. The following is an excerpt from the search warrant results:

**August 20, 2017**

Shawn FARRIS to (276) 274-6648 (Darlene BARRETT), *"Don't no it was Sunday I will send it in the morning"*

BARRETT to FARRIS, *"Damn"*

BARRETT to FARRIS, *"Ok"*

Based on my training and experience and knowledge of this investigation I believe that Shawn FARRIS contacted Darlene BARRETT to advise her that he was not able to send a package of methamphetamine to her because it was Sunday. I believe that FARRIS told BARRETT he would send the methamphetamine the next day.

**August 25, 2017**

(276) 274-6648 (Darlene BARRETT) to Shawn FARRIS, *"Why 15 when it's been 14"*

FARRIS to BARRETT, *"Because the blue stuff was extra"*

BARRETT to FARRIS, *"Damn we each got one blue so 7500 a piece"*

FARRIS to BARRETT, *"Yes"*

BARRETT to FARRIS, *"Ok"*

Based on my training and experience and knowledge of this investigation, I believe that Darlene BARRETT utilized the text messaging service of her phone to contact Shawn FARRIS on his cellular telephone. I believe that BARRETT asked FARRIS why he sent her 15 ounces of methamphetamine when she usually received 14 ounces, *"Why 15 when it's been 14"*. I believe that FARRIS advised BARRETT that they received an extra ounce of "blue" methamphetamine free of charge. I believe that BARRETT then confirmed that she would owe \$7,500.00 for the methamphetamine she received, *"Damn we each got one blue so 7500 a piece"*.

On September 19, 2017, Brad WILLIAMS was arrested in Abingdon, VA with approximately one (1) ounce of methamphetamine and \$4,400.00 U.S. Currency.

On September 19, 2017, CS-6 was interviewed. During the interview CS-6 stated that Brad WILLIAMS was a methamphetamine distributor in Southwest Virginia. CS-6 stated that she had been with WILLIAMS when he sold methamphetamine numerous times to several different people. CS-6 stated that Darlene BARRETT was the methamphetamine source of supply for WILLIAMS.

CS-6 also stated that she had known BARRETT for about ten (10) years. CS-6 stated that BARRETT had provided methamphetamine to her several times over the past four (4) months for personal use. CS-6 stated that she had smoked methamphetamine with BARRETT on numerous occasions.

On January 5, 2018, a Confidential Source (CS), working with the Russell County, Virginia and Washington County, Virginia Sheriff's Office's advised that he/she could make a

controlled purchase of two (2) "8 balls" (1/8 ounce) of methamphetamine from Susan PAYNE. The CS further advised that PAYNE's source of supply for the methamphetamine was Darlene BARRETT. The CS met with law enforcement and his/her person was searched and no illegal substances/narcotics were found. The CS agreed to have an undercover (UC) drive him/her to the purchase location. After several phone calls and discussion it was decided that the UC would drive the CS to Dairy Queen located on West Main Street in Abingdon, Virginia to meet PAYNE. The CS was provided with an audio recording device and \$500.00 United States currency for the transaction. Once there the CS got into PAYNE's vehicle and they drove to 240 Campbell Street Abingdon, VA (approximately one (1) mile from Dairy Queen). Upon arrival a vehicle appearing similar to a Chevrolet Equinox that the CS stated was BARRETT's pulled in behind PAYNE's vehicle. Two people exited the vehicle and went inside the residence. PAYNE collected the \$500.00 from the CS and went into the residence. A short time later, PAYNE exited the residence and got back into her vehicle and handed the CS a Ziploc style bag containing a crystal substance. PAYNE advised the CS that the bag contained seven (7) grams of methamphetamine. PAYNE then dropped the CS off to the UC at Dairy Queen. The methamphetamine was collected and preserved for evidence.

On January 19, 2018, CS-9 was interviewed by law enforcement regarding his knowledge of methamphetamine distribution in Southwest Virginia. CS-9 stated that Susan PAYNE aka WRIGHT had been his methamphetamine source of supply for two (2) to three (3) years. CS-9 advised that he obtained an "8 ball" (1/8 ounce) of methamphetamine from PAYNE every other week and paid \$200 - \$300 per "8 ball". CS-9 advised that the most methamphetamine with which he had seen PAYNE was 1/2 to one (1) ounce at one time.

CS-9 advised law enforcement that PAYNE's source of supply for methamphetamine



was Darlene BARRETT. CS-9 knew that BARRETT was PAYNE's source because PAYNE had told him the same and CS-9 had been present with PAYNE when BARRETT had delivered methamphetamine to PAYNE's residence.

CS-9 also stated that he had purchased methamphetamine from BARRETT three (3) to four (4) times in "8 ball" (1/8 ounce) quantities.

CS-9 advised that PAYNE and BARRETT have advised him that BARRETT's source of supply for methamphetamine lived on Orebank Road in Kingsport, Tennessee. PAYNE advised CS-9 that BARRETT was also getting methamphetamine from "Mexicans". CS-9 advised that BARRETT was also getting methamphetamine mailed to her in Bristol, Virginia. CS-9 advised that PAYNE had the idea to steal one of the packages that BARRETT was to receive. PAYNE told CS-9 that the package was one (1) pound of crystal methamphetamine and the mail came at 2:00 p.m.

CS-9 further advised that a few months ago, BARRETT's son stole \$17,000.00 in cash and methamphetamine from BARRETT.

On February 2, 2018, ATF CS-10272 was interviewed by law enforcement. The CS stated that Darlene BARRETT was a methamphetamine distributor.

On March 13, 2018, CS-6 was interviewed by law enforcement regarding her knowledge of drug trafficking in Southwest, VA. CS-6 had been arrested earlier in the day and while at the jail a quantity of methamphetamine had been discovered inside one of her body cavities.

CS-6 advised that the methamphetamine that she had was obtained from Darlene BARRETT. CS-6 advised that she had been friends with BARRETT for many years and obtained methamphetamine from her often. CS-6 advised that she never paid for the

methamphetamine, but BARRETT always gave it to her. CS-6 advised that she obtained it from BARRETT at BARRETT's house and other locations.

CS-6 advised that BARRETT obtained her methamphetamine from a white male named "Shawn" from California. CS-6 advised that "Shawn" sent crystal methamphetamine to BARRETT and Brad WILLIAMS. CS-6 advised that she had spoken to "Shawn" one time on the phone, but had never met him.

CS-6 advised that she had received methamphetamine from WILLIAMS, but did not have to pay for it, he always gave it to her.

On March 15, 2018, the United States Postal Service discovered a package that was mailed from California to Darlene BARRETT at 240 Campbell Street Abingdon, VA. The USPS intercepted the package and after a police K-9 alerted to the package having an illegal narcotic inside of it, a search warrant was obtained by the USPS. A crystal like substance was found inside the package that was field tested and was positive for methamphetamine.

The methamphetamine was replaced with a "fake" substance and repackaged in the original package. A federal search warrant was obtained for 240 Campbell Street Abingdon, VA (known residence of Melissa Darlene BARRETT). On March 16, 2018, the package of methamphetamine was delivered by the USPS and after the package was taken from the mailbox, the search warrant was served.

Several items were found during the search and they included the following items: the package of "fake" methamphetamine that was delivered by USPS, two (2) sets of digital scales, several empty zip style bags and other items.

The following text message was recovered from BARRETT's phone:

**March 16, 2018**

(276) 791-6721 (Shawn FARRIS) to (276) 274-6648 (Darlene BARRETT), *"It's there"*

Based on my training and experience, and knowledge of this investigation, I believe that Shawn FARRIS advised Darlene BARRETT that the package of methamphetamine he sent her had arrived at her house. I believe that FARRIS had been tracking the package via the United States Postal Service tracking number.

BARRETT was interviewed by law enforcement on the same day. Before the interview started, BARRETT was advised of her Miranda rights and she acknowledged she understood them and agreed to speak with law enforcement. BARRETT stated that her source of supply for methamphetamine was Shawn FARRIS. BARRETT advised that she met FARRIS in January 2017 through a mutual friend, John Ratcliff. BARRETT purchased 1/8 ounce of methamphetamine for \$225.00 from FARRIS during the first meeting. For the next four (4) months BARRETT purchased 1/8 ounce of methamphetamine from FARRIS two (2) to three (3) time per week for \$200.00 each. After four (4) months, FARRIS "fronted" one (1) ounce of methamphetamine for \$700.00. BARRETT was then "fronted" one (1) ounce of methamphetamine per week for the next four (4) to five (5) months. After FARRIS moved back to California, he started mailing the methamphetamine to BARRETT. During the last three (3) to four (4) months, FARRIS had been fronting 1/4 pound quantities of methamphetamine to BARRETT for \$1750.00. The packages with 1/4 lb. quantities arrived every week or two. Once or twice the packages that FARRIS sent to BARRETT only contained one (1) ounce of methamphetamine. BARRETT advised there was a six (6) week period when she did not receive

any methamphetamine from FARRIS. BARRETT advised that she would owe FARRIS \$1,750.00 for every four (4) ounces of methamphetamine she received from him. FARRIS advised BARRETT to never sign for packages. BARRETT advised that she used the Postal Service to mail the money back to FARRIS. She placed the United States currency into a little yellow, plastic, bubble wrap lined envelope with the currency inside. She then placed the envelope inside of a USPS Priority Mail Box and mails the package to Shawn FARRIS at 253 Standing Bear Road, Cathedral City, CA.

According to the records of NCIC, Melissa Darlene BARRETT had no prior drug felonies.

**Susan Nicole PAYNE, aka Susan WRIGHT**

According to the records of Verizon Wireless, telephone number (276) 525-2233 was subscribed to by David Payne at 22002 Neal Rd., Abingdon, VA.

On May 15, 2015, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (423) 341-4177 (Jeremy BARTLEY). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from April 30, 2015 to May 15, 2015.

The following is an excerpt from the search warrant results:

**April 30, 2015**

(423) 341-2177 (Jeremy BARTLEY) to (276) 525-2233 (Susan PAYNE), *"Hey I need to come get that money"*

PAYNE to BARTLEY, *"Where the fuck u been for days"*

PAYNE to BARTLEY, *"Don't bring anyone with you!!!!"*

Based on my training and experience, and my knowledge of this investigation, I believe that Jeremy BARTLEY contacted Susan PAYNE in an effort to collect drug proceeds.

**May 6, 2015**

(423) 341-2177 (Jeremy BARTLEY) to (276) 525-2233 (Susan PAYNE), *"I need cash for the two grams u got last"*

PAYNE to BARTLEY, *"I can't believe u came up and didn't yell at me"*

BARTLEY to PAYNE, *"Hell from what Iv ben tould u don't want me around . Hell Iv ben good as I canto u and your kids Iv never gave u a reson to not trust me! If I get busted that's on me but I'm trying to make sll these ppl happy really I need to make me happy"*

BARTLEY to PAYNE, *"I'm sick of fight I'm sick of getin bitched out alk time I'm a man of my word that's all Iv got to got u keep tellin Charley lies Iv never called Jenny my gf we ant fuckin she just gets shit cheeper then me and I mean 500 \$ cheeper ."*

BARTLEY to PAYNE, *"Just get my money ready and Ill come grab it up and then I'm done..."*

Based on my training and experience, and my knowledge of this investigation, I believe that Jeremy BARTLEY contacted Susan PAYNE to collect money for two (2) grams of methamphetamine. I believe that BARTLEY proceeded to tell PAYNE that the only reason he was with "Jenny" was because she could get methamphetamine at a cheaper price than he could.

Based upon other text messages received in this investigation, as well as information received from CS', I believe that when referring to "Jenny", BARTLEY was referring to Jannie

Perkey who was the ex-girlfriend of Dakota BARKER and had a personal relationship with Alan Davis in Atlanta, GA.

On May 18, 2015, CS-18 was interviewed in Abingdon, VA. CS-18 was in federal custody for Conspiracy to Distribute Methamphetamine. CS-18 identified a photograph of Susan PAYNE and stated that CS-18 had sold a couple of grams of methamphetamine to PAYNE over the past two (2) years.

On June 13, 2015, CS-19 was interviewed in Blountville, TN. CS-19 stated that Jeremy BARTLEY was a crystal methamphetamine distributor in Abingdon, VA. CS-19 stated that he/she was introduced to BARTLEY by Susan PAYNE for the purpose of obtaining methamphetamine. CS-19 stated that PAYNE was a distributor of methamphetamine for BARTLEY.

On June 15, 2015, CS-20 was interviewed in Bristol, VA. CS-20 stated that Jeremy BARTLEY was a crystal methamphetamine distributor in Southwest Virginia. CS-20 stated that Susan LNU was a distributor of methamphetamine for BARTLEY.

According to the records of Verizon Wireless, telephone number (276) 525-5964 was subscribed to by David Payne at 22002 Neal Rd., Abingdon, VA.

On June 18, 2015, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the account of (276) 791-1640 (Jeremy BARTLEY). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from June 8, 2015 to June 18, 2015. The following is an excerpt from the search warrant results:



**June 16, 2015**

(276) 791-1640 (Jeremy BARTLEY) to (276) 525-5964 (Susan PAYNE), *"Hey can u get on the five plz"*

PAYNE to BARTLEY, *"Yes"*

**June 17, 2015**

BARTLEY to PAYNE, *"U get them yet"*

PAYNE to BARTLEY, *"That mother fucker must have died!"*

BARTLEY to PAYNE, *"Well u bring hem back"*

PAYNE to BARTLEY, *"My lord I got them"*

BARTLEY to PAYNE, *"Where are u?"*

PAYNE to BARTLEY, *"I'll yell at u when I get them to sleep"*

BARTLEY to PAYNE, *"He'll ya B say in he ready to roll"*

Based on my training and experience, and my knowledge of this investigation, I believe that Jeremy BARTLEY contacted Susan PAYNE to collect drug proceeds, possibly for five (5) grams of methamphetamine. I believe that PAYNE was able to collect, notified BARTLEY that she had the money, and BARTLEY stated that Brandin HYDE (aka "B") was ready to take a trip to purchase additional methamphetamine.

On July 2, 2015, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of (276) 791-1640 (Jeremy BARTLEY) and (276) 395-0056 (Brandin HYDE). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from June 18, 2015 to July 2, 2015. The following is an excerpt from the search warrant results:

**June 19, 2015**

(276) 791-1640 (Jeremy BARTLEY) to (276) 525-5964 (Susan PAYNE), *"Find me an r lmao"*

PAYNE to BARTLEY, *"Ok"*

BARTLEY to PAYNE, *"U ok now"*

PAYNE to BARTLEY, *"That bitch still ain't payed me. And I'm waiting on call for ur things"*

BARTLEY to PAYNE, *"I need them bad lol"*

PAYNE to BARTLEY, *"He s trying to put me off but it ain t happening Judy has gave me hell all afternoon even at dads I m driving her around now trying to get her to sleep so I can just show up on his fucking door he wont think I just show up cause the babies"*

Based on my training and experience, and my knowledge of this investigation, I believe that Jeremy BARTLEY contacted Susan PAYNE to order a Roxicet (aka "r") and collect drug proceeds ("u ok now"). I believe that PAYNE told BARTLEY that after her baby fell asleep she was going to visit the person from whom she was trying to collect the money.

#### **June 21, 2015**

(276) 525-5964 (Susan PAYNE) to (276) 791-1640 (Jeremy BARTLEY), *"Damn where u at"*

PAYNE to (276) 395-0056 (Brandin HYDE), *"U heard from J"*

HYDE to PAYNE, *"Sue.. r u awake"*

PAYNE to HYDE, *"Ya"*

HYDE to PAYNE, *"K can I get him sum them things from u"*

PAYNE to HYDE, *"Yes he can have all that I have he knows that but I think there's only like 4 damn I don't think help him!"*

Based on my training and experience, and my knowledge of this investigation, I believe that Susan PAYNE contacted Brandin HYDE in an attempt to contact Jeremy BARTLEY. I

believe that PAYNE agreed to provide four (4) Roxicet tablets to HYDE for BARTLEY's personal use.

**June 26 - 27, 2015**

(276) 791-1640 (Jeremy BARTLEY) to (276) 525-5964 (Susan PAYNE), *"Hey have u came up with that money yet Iv got to do something and fast"*

PAYNE to BARTLEY, *"No I haven t I have not even paid my car payment and don t have it after someone took money out of pocket book sometime between 1 yesterday and 1130 today only place could have happened was at apt"*

BARTLEY to PAYNE, *"Who was thir"*

PAYNE to BARTLEY, *"sorry sorry u ask who was at my house it was only 3or4 people Brandon I know not him girl next door Rob Anthony and I can t remember if Mark was in and out I want to say he had been over at B and ran in to say hi but I m doing all I can today ok I well yell at u in a bit I m done with that bitch Missy she told me I could fuck off"*

BARTLEY to PAYNE, *"Hey how much got took"*

PAYNE to BARTLEY, *"Right at 400 it was 383or393"*

BARTLEY to PAYNE, *"Mark"*

BARTLEY to PAYNE, *"He came up with 500last night some how"*

Based on my training and experience, and my knowledge of this investigation, I believe that Jeremy BARTLEY contacted Susan PAYNE to collect drug proceeds. I believe that PAYNE advised BARTLEY that she had been robbed of almost \$400.00 that was owed to BARTLEY. I believe that BARTLEY told PAYNE that *"Mark"* had unexpectedly come up with \$500.00 the night before.

**June 27 - 28, 2015**

(276) 525-5964 (Susan PAYNE) to (276) 791-1640 (Jeremy BARTLEY), *"I just talk to B he said he's been texting u every 5 mins"*

BARTLEY to PAYNE, *"Ya want in dope"*

PAYNE to BARTLEY, *"What?"*

BARTLEY to PAYNE, *"Iv got some killer I need it gone"*

Based on my training and experience, and my knowledge of this investigation, I believe that Susan PAYNE contacted Jeremy BARTLEY to advise him that Brandin HYDE (aka "B") was trying to get in touch with him. I believe that BARTLEY advised PAYNE that he was in possession of some high quality methamphetamine (aka *"killer dope"*) that HYDE wanted.

**June 30, 2015**

(276) 395-0056 (Brandin HYDE) to (276) 525-5964 (Susan PAYNE), *"Can I come c you soon"*

PAYNE to HYDE, *"I'm at my dads what's up"*

HYDE to PAYNE, *"Biz"*

PAYNE to HYDE, *"Oh hold up we cooking and I yell at u ok"*

HYDE to PAYNE, *"K"*

**July 1, 2015**

HYDE to PAYNE, *"Hey Sue jus wanted to c if u had that yet. Not tryin to rush ya or anything but I gonna get more dog food this eve."*

PAYNE to HYDE, *"Yeah I'll yell at u in just a little"*

HYDE to PAYNE, *"Ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandin HYDE contacted Susan PAYNE to discuss a business proposition with her. I believe that PAYNE agreed to provide money to HYDE to purchase methamphetamine (aka *"dog food"*).

On July 16, 2015, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of (276) 395-0056 (Brandin HYDE) and (540) 759-2597 (Jeremy BARTLEY). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from July 2, 2015 to July 16, 2015. The following is an excerpt from the search warrant results:

**July 3, 2015**

PAYNE to HYDE, *"I was at apt all day yesterday why u not come by"*

HYDE to PAYNE, *"I texted u couple times I can come by shortly and really need it also"*

HYDE to PAYNE, *"Can I come by I'm really needing dat munny and I hav sum good dvds to show. ya also"*

PAYNE to HYDE, *"U at the apt"*

HYDE to PAYNE, *"Not yet package don't come in til twelve but will b there"*

PAYNE to HYDE, *"Ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Susan PAYNE contacted Brandin HYDE to ask why he did not come to her apartment. I believe that HYDE told PAYNE that he needed her money and the package of methamphetamine would be arriving at 12:00.

**July 5, 2015**

(276) 525-5964 (Susan PAYNE) to (276) 395-0056 (Brandin HYDE), *"Ash getting ready to change my phn I txt u with it"*

(276) 525-2703 (Susan PAYNE) to HYDE, *"This is my new number don't give it to anybody"*

Based on my training and experience, and my knowledge of this investigation, I believe that Susan PAYNE contacted Brandin HYDE to advise him of her new cellular telephone number.

On July 31, 2015, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of (276) 395-0056 (Brandin HYDE). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from July 16, 2015 to July 31, 2015. The following is an excerpt from the search warrant results:

**July 23, 2015**

HYDE to PAYNE, *"Hey Sue u think there anyway we can square up on money today I'm hurting like a ma fucker for cash rite now"*

PAYNE to HYDE, *"It be later this afternoon!"*

**July 25, 2015**

HYDE to PAYNE, *"I m good on a lil bit of fire but I need cash and need to collect if possible everybody is hurt in me from gettin anything big cuz I can t get my money that s owed out it hurting me"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandin HYDE contacted Susan PAYNE to notify her that he was in possession of a little bit of methamphetamine (aka *"fire"*), but needed to collect drug proceeds from her and others to purchase additional methamphetamine.

**July 27, 2015**

(276) 395-0056 (Brandin HYDE) to (276) 525-2703 (Susan PAYNE), *"Yo Sue wats good."*

PAYNE to HYDE, *"Brandon when did u start working for them?"*



HYDE to PAYNE, *"Wat the fuck u talking bout. I hope yur joking rite"*

PAYNE to HYDE, *"No I'm not?"*

HYDE to PAYNE, *"Well yur wrong. And u of all people should no that."*

HYDE to PAYNE, *"Day wat lies ya want but I bet notta god dam soul can or will show me any paperwork on me ever and who ever started that tell em to balls up and say it to my god dam face instead of a ducking lying dint in the shadows"*

HYDE to PAYNE, *"I need my dam money no matter wat lies ya talking Sue that's sum fucked up god dam shit."*

HYDE to PAYNE, *"I'll b by wen I get bac in lil while I need my motherfucking money u owe me and hav owed me for a month then u ain't gotta worry bout fuckin wit me ever again and if u wanna see he ll in the eyes like u never seen before then call me a snitch again that s yur one time pass I ain t never told on nobody that sounds like bullshit to avoid paying a ma fucker his money owed that s alright though cuz everybody calls u a snitch I jus won t take up for u no more"*

#### **July 31, 2015**

HYDE to PAYNE, *"Hey I need that mony Sue today"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brandin HYDE contacted Susan PAYNE in an effort to collect drug proceeds. I believe that PAYNE accused HYDE of working for the police (aka *"snitch"*), to which he took offense. I believe that HYDE accused PAYNE of using that as an excuse not to pay her drug debt to him. I believe that HYDE continued to make attempts at collecting his drug money.

On August 14, 2015, CS-21 was interviewed at the Abingdon Regional Jail. CS-21 stated that Brandin HYDE and Jeremy BARTLEY were distributors of crystal methamphetamine in SW VA. CS-21 stated that HYDE had others who sold methamphetamine for him including Susan PAYNE, Connie Strouth, Dawn (Vincente), Missy (Harless), and Mark (Wilson).

On December 16, 2015, CS-22 was interviewed pursuant to her arrest in the Western District of Virginia for Conspiracy to Distribute Methamphetamine. CS-22 stated that one of her

sources of supply for methamphetamine was Susan PAYNE. CS-22 stated that she had obtained methamphetamine from PAYNE somewhere between 25 and 40 times. CS-22 stated that PAYNE sold methamphetamine to several people, including Brandin Hyde, Jennifer, Jamie and "Opie". CS-22 stated that PAYNE was supplied methamphetamine by Jeremy Bartley and Dawn Vincente. CS-22 stated that Darlene BARRETT was also supplied methamphetamine by Vincente.

On February 25, 2016, CS-23 was interviewed pursuant to her arrest for possession with intent to distribute methamphetamine. CS-23 stated that her source of supply for methamphetamine was Brandon Stone. CS-23 stated that she obtained "8 balls" (1/8 ounce) of methamphetamine every other day from Stone for the last three (3) weeks. CS-23 stated that she used half of the methamphetamine she obtained from Stone, and gave the rest to Susan PAYNE to sell. CS-23 stated that PAYNE sold the methamphetamine given to her and paid CS-23 \$240.00. CS-23 stated that PAYNE used to sell methamphetamine for Jeremy Bartley.

On March 22, 2016, CS-24 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-24 stated that he sold methamphetamine for Jeremy Bartley until Bartley started using Susan PAYNE as his main distributor. CS-24 stated that PAYNE sold most of Bartley's methamphetamine, and provided methamphetamine to CS-24 on a couple of occasions.

On March 31, 2016, CS-25 was interviewed pursuant to a proffer agreement entered into with the U.S. Attorney's Office in Abingdon, VA. CS-25 stated that when he and Jeremy Bartley brought methamphetamine back from Georgia, they took the methamphetamine to the

residence of Susan PAYNE to "break it up" (split it up for distribution). CS-25 stated that he sold methamphetamine to PAYNE, Crystal Pharis and others for distribution.

On January 5, 2018, a Confidential Source working with the Russell County, Virginia Sheriff's Office (RCSO) and the Washington County, Virginia Sheriff's Office (WCSO) agreed to purchase methamphetamine from Susan PAYNE. Detective Mike Horner (RCSO) acted as the undercover (UC) officer during the deal by driving the CS. After several phone calls from the CS to PAYNE it was agreed that the CS would purchase two (2) "8 balls" (1/8 ounce each) of methamphetamine. Eventually, the CS and UC met PAYNE at the Exit 14 Dairy Queen. The CS got into PAYNE's vehicle and they drive to Campbell Street Abingdon, Virginia (known residence of Darlene BARRETT). The CS gave PAYNE \$500.00 of documented money that had been provided to her by law enforcement. PAYNE went into the residence and left the CS in the vehicle. A short time later PAYNE exited the residence (later determined to be 240 Campbell Street) and got back into the vehicle and gave the CS a one (1) Ziploc style bag that was supposed to have seven (7) grams of methamphetamine. PAYNE then drove the CS back to Dairy Queen and the CS got back into the vehicle with the UC and they drove to a staging location. The methamphetamine was turned over to TFO Kevin Widener for safekeeping.

On January 19, 2018, CS-9 was interviewed by law enforcement regarding his knowledge of methamphetamine distribution in Southwest Virginia. CS-9 stated that Susan PAYNE aka WRIGHT has been his methamphetamine source of supply for two to three (2-3) years. CS-9 advised that he obtain an "8 ball" (1/8 ounce) of methamphetamine from PAYNE every other week and paid \$200 - \$300 per "8 ball". CS-9 advised that the most methamphetamine with which he had seen PAYNE was ½ to one (1) ounce.

CS-9 advised law enforcement that PAYNE's source of supply for methamphetamine

was Darlene BARRETT. CS-9 knew that BARRETT was PAYNE's source because PAYNE had told him the same and CS-9 had been present with PAYNE when BARRETT had delivered methamphetamine to PAYNE's residence.

CS-9 also stated that he had purchased methamphetamine from BARRETT three to four (3-4) times in "8 ball" (1/8 ounce) quantities.

CS-9 advised that PAYNE and BARRETT had advised him that BARRETT's source of methamphetamine lived on Orebank Road in Kingsport, Tennessee. PAYNE advised CS-9 that BARRETT was also getting methamphetamine from "Mexicans". CS-9 advised that BARRETT was also getting methamphetamine mailed to her in Bristol, Virginia. CS-9 advised that PAYNE had the idea to steal one of the packages that BARRETT was to receive. PAYNE told CS-9 that the package was one (1) pound of crystal methamphetamine and the mail came at 2:00 p.m.

On March 16, 2018, Darlene BARRETT was interviewed in Abingdon, VA. BARRETT stated that she received methamphetamine through the mail from Shawn FARRIS who lived in California. BARRETT stated that Susan PAYNE, aka WRIGHT, was a sub-distributor of methamphetamine for her. BARRETT stated that she had given PAYNE one (1) to two (2) ounce quantities of methamphetamine in the past.

According to the records of NCIC, Susan PAYNE has no prior drug felonies.

### **Bradley Scott WILLIAMS**

On December 16, 2016, CS-22 was interviewed pursuant to her arrest for Conspiracy to Distribute Methamphetamine in the Western District of Virginia. CS-22 stated that she was a methamphetamine user who sold small amounts to support her habit. CS-22 stated that she obtained methamphetamine from Jeremy Bartley, Dawn Vincente, Susan PAYNE and Darlene

BARRETT. CS-22 stated that Brad WILLIAMS sold methamphetamine for Vincente and delivered it to CS-22 on a couple of occasions.

On September 13, 2017, a search warrant was applied for and obtained in the Western District of Virginia for text message content stored in the accounts of telephone number (276) 791-6721 (Shawn FARRIS). In response to the execution of this search warrant on Verizon Wireless, agents received text messages stored in those accounts from August 30 to September 13, 2017. The following is an excerpt from the search warrant results:

**September 11, 2017**

(276) 206-0368 (Bradley WILLIAMS) to (276) 791-6721 (Shawn FARRIS), *"Hey bro, everything ok?"*

FARRIS to WILLIAMS, *"Address please"*

WILLIAMS to FARRIS, *"209 B Street Abingdon, VA 24210"*

WILLIAMS to FARRIS, *"You have my address right"*

FARRIS to WILLIAMS, *"That's what I was looking for I just need house number and zip"*

**September 12, 2017**

FARRIS to WILLIAMS, *"I sent some boxes for you to send money"*

WILLIAMS to FARRIS, *"ok"*

Based on my training and experience, and my knowledge of this investigation, I believe that Brad WILLIAMS provided an address to Shawn FARRIS to which FARRIS sent a package of methamphetamine. I also believe that FARRIS advised WILLIAMS that he included shipping boxes in the package of methamphetamine for WILLIAMS to send money to FARRIS once the methamphetamine was sold. The address used to send the package to WILLIAMS was 209 B

Street Abingdon, VA. Your affiant knows that this is the known address of Charlotte Finch, obtained from the Abingdon Police Department database. Charlotte Finch is the on again off again girlfriend of WILLIAMS and she is the mother of WILLIAMS' children.

On September 19, 2017, Officer Yancy Wilmoth with the Abingdon, Virginia Police Department noticed Bradley Scott WILLIAMS at the Foam Wash located on Cook Street in Abingdon, Virginia. Officer Wilmoth knew that WILLIAMS had an outstanding arrest warrant for him from Washington County, Virginia. Wilmoth noted that a Mercedes SUV was pulled into a wash bay and WILLIAMS was washing the vehicle.

As Wilmoth was taking WILLIAMS into custody, WILLIAMS asked Wilmoth if he could give his money to his girlfriend who was inside the vehicle. Wilmoth allowed WILLIAMS to do so. As the front passenger door was opened, Wilmoth noticed a strong odor of marijuana coming from the vehicle. At this time WILLIAMS removed an item from his left front pants pocket and quickly put it in the female passengers lap. The item was a thick wad of cash held together by rubber bands. Wilmoth retrieved the cash and placed it on the top of the vehicle. As Wilmoth was taking WILLIAMS into custody a black male came to their location from another wash bay and asked WILLIAMS what was going on before returning to his vehicle and driving off in a gold Chevrolet Malibu. WILLIAMS was advised of his Miranda Rights and placed in the rear of Wilmoth's patrol vehicle. The female passenger of the Mercedes was identified as Nickey Sue Snead.

A blue Suzuki motorcycle was parked in front of the wash bay were the gold Chevrolet Malibu had been. The motorcycle had a helmet, mounted cell phone and the keys were in the ignition. Employees of the car wash advised that a male subject had been with the motorcycle and was interacting with the female in the Mercedes and the black male. Snead informed



officers that the Mercedes belonged to WILLIAMS and that WILLIAMS had driven the motorcycle to the car wash.

Snead's belongings were removed from the Mercedes and she permitted them to be searched. No illegal items were located within Snead's belongings.

During the search of the Mercedes, several illegal items were found. Found in the center console of the vehicle were the following items: Ziploc style bag containing a crystal substance (methamphetamine), plastic bag with green plant material (marijuana), various small Ziplock style bags, and an O'Reilly's receipt for the purchase of car cleaning items. A Wal-Mart receipt showing that the Mercedes had been serviced two (2) days prior was found in the glove box of the vehicle. Brad WILLIAMS name was on the receipt as being the person who had the vehicle serviced. A red and black backpack was found in the rear seat. Snead advised that the backpack belonged to WILLIAMS. Dried mushrooms were found inside the backpack.

On September 19, 2017, CS-6 was interviewed in Abingdon, VA. CS-6 stated that she met Brad WILLIAMS about one (1) month prior to this interview through Darlene BARRETT. CS-6 advised that WILLIAMS had been staying at BARRETT's residence since BARRETT had bonded him from jail. CS-6 advised she had been spending a lot more time with WILLIAMS over the last few weeks and as a result she has had a falling out with BARRETT.

CS-6 advised that WILLIAMS was an "8 ball" (1/8 ounce) ice methamphetamine trafficker. CS-6 advised that WILLIAMS distributed methamphetamine several times a day every day. CS-6 stated that WILLIAMS charged between \$215.00 and \$220.00 for each "8 ball" (1/8 ounce). CS-6 advised that at times, she received calls for methamphetamine and she coordinated the methamphetamine deals for WILLIAMS. CS-6 advised that WILLIAMS

sometimes traded methamphetamine for marijuana. CS-6 advised that WILLIAMS had several customers whom he meets at different places. One of WILLIAMS' customers was a black male nicknamed "*Cuz*" who drove a gold Buick or a red Mustang. CS-6 advised that "*Cuz*" met WILLIAMS wherever he happened to be at the time. CS-6 advised that she was unsure whether BARRETT was WILLIAMS' source or WILLIAMS was BARRETT's source, but advised that it appeared that BARRETT was the source of supply for methamphetamine.

According to the records of NCIC, Bradley Scott WILLIAMS has 16 prior felony convictions, including several drug trafficking felonies.

**Devon Scott COLEMAN, aka "*Cuz*"**

On January 12, 2017, CS-11 was interviewed by law enforcement. CS-11 stated that Devon, aka "*Black Cuz*", obtained ounces of methamphetamine from Ricky Miller. Your affiant is aware that "*Cuz*" is a nickname for Devon COLEMAN, who is a black male.

On January 18, 2017, CS-12 was interviewed by law enforcement. CS-12 stated that Devon Coleman went by the nickname "*Cuz*". CS-12 advised that COLEMAN had driven her to pick up and sell methamphetamine.

On February 8, 2017, Devon COLEMAN was arrested following a pursuit in Glade Spring, VA. COLEMAN was operating a red Ford Mustang at the time. Pursuant to a search of COLEMAN's vehicle, officers seized crystal methamphetamine, digital scales, drug paraphernalia, and several cellular telephones.

On September 19, 2017, Brad WILLIAMS was arrested in Abingdon, VA with approximately one (1) ounce of methamphetamine and \$4,400.00 U.S. Currency. During the arrest of WILLIAMS, which occurred at a car wash, a black male from a gold Chevrolet Malibu type vehicle approached officers to inquire about WILLIAMS. Witnesses had observed WILLIAMS and the black male together prior to the arrest.

On September 19, 2017, CS-6 was interviewed. CS-6 stated that Brad WILLIAMS was a methamphetamine distributor in Southwest Virginia. CS-6 stated that she had been with WILLIAMS when he sold methamphetamine numerous times to several different people. CS-6 stated that one of WILLIAMS' distributors was a black male nicknamed "Cuz" who drove a gold Buick and a red Ford Mustang. CS-6 stated that Darlene BARRETT was the methamphetamine source of supply for WILLIAMS.

On September 20, 2017, the Washington County Sheriff's Office received a call regarding a suspicious vehicle parked at Patrick Henry High School. Upon arrival, deputies observed Devon COLEMAN passed out in the driver's seat of the vehicle. After making contact, COLEMAN advised deputies that he had a .38 Special in the center console of his vehicle. Deputies observed what appeared to be marijuana in the vehicle. Pursuant to a search of COLEMAN's vehicle, approximately 11 ounces of methamphetamine, digital scales, baggies and other paraphernalia were seized.

On October 30, 2017, CS-49 was interviewed in Abingdon, VA. CS-49 provided information on several methamphetamine distributors in Southwest Virginia. CS-49 stated that several of these distributors were supplied methamphetamine by Devon COLEMAN.

On January 26, 2018, CS-49 was interviewed again in Abingdon, VA. CS-49 stated that the night before Devon COLEMAN was arrested at Patrick Henry High School, he supplied four (4) ounces of methamphetamine to Glenda Keller and Anthony Boardwine.

On March 13, 2018, CS-6 was interviewed in Abingdon, VA. CS-6 stated that the methamphetamine with which Devon COLEMAN was arrested in September 2017 was supplied to him by Brad WILLIAMS. CS-6 stated that WILLIAMS had just received a package from Shawn FARRIS and provided two (2) ounces of methamphetamine to COLEMAN. CS-6 stated that COLEMAN was arrested the following day.

On April 7, 2018, CS-28 was interviewed following her arrest in Saltville, VA in possession of ½ ounce of methamphetamine. CS-28 stated that she had sold methamphetamine to Devon COLEMAN a couple of time prior to his arrest at Patrick Henry High School. CS-28 stated that prior to that, she had driven COLEMAN to Bristol, VA at least four (4) times to acquire methamphetamine. CS-28 stated that she didn't know what amounts of methamphetamine COLEMAN purchased, but she observe him in possession of a lot of money. CS-28 stated that COLEMAN paid her \$200.00 per trip to Bristol.

CS-28 stated that she had "rented" her vehicle to COLEMAN so he could use it to buy and sell crystal methamphetamine. CS-28 stated that she knew COLEMAN was "running dope" with the vehicle.

According to the records of NCIC, Devon Scott COLEMAN has no prior drug felony convictions.

#### **Cooperating Sources**

Throughout this affidavit your affiant has identified several individuals by name and several as Cooperating Sources (CS) which were interviewed and/or assisted law enforcement during this investigation. Your affiant believes the information provided by them, and included in this affidavit, to be credible and reliable for the following reasons: the debriefings included statements against their own penal interest, the information provided by them matched information received from other sources, and much of this information was confirmed by other investigative methods. Some of these methods included surveillances and records acquired during the investigation, including records of phone calls and text messages between the co-conspirators.

CS' are utilized for several reasons: a CS might be a member of the target organization and therefore have easy access to information needed by law enforcement; a CS might have a relationship with members of the target organization, making it easy to purchase and/or locate illegal substances, profits, etc.; and in many situations a CS provides to law enforcement the opportunity to infiltrate an organization when all other means are exhausted.

CS-1, CS-2, CS-3, CS-4, CS-5, CS-7, CS-14, CS-16, CS-18, CS-21, CS-22, CS-23, CS-24, CS-25, CS-27, CS-29, CS-31, CS-35 and CS-37 were arrested for violations of the law, most of which were drug distribution charges. The CS' provided information on other crimes, including drug traffickers, in return for consideration for bond and/or reduced sentences.

CS-6, CS-8, CS-10, CS-11, CS-12, CS-13, CS-15, CS-17, CS-20, CS-26, CS-28, CS-30, CS-32, CS-33, CS-34, CS-36, CS-38, CS-39, CS-40, CS-41, CS-42, CS-43, CS-44, CS-45, CS-46, CS-47, CS-48 and CS-49 provided information to law enforcement in return for consideration for charges which had not yet been brought against them.

CS-9 and CS-19 cooperated with law enforcement in return for monetary compensation, making undercover purchases of narcotics in furtherance of successful prosecutions.

### **Telephone Toll Analysis**

Based on my training and experience, I know the following: Distributors of narcotics, including but not limited to methamphetamine, oxycodone and other pharmaceutical drugs, communicate extensively by the use of cellular telephones. These cellular telephones are often in the names of other people or non-existent persons with fraudulent addresses to avoid law enforcement detection. Drug distributors often change cellular telephones and/or cellular telephone numbers to further avoid detection by law enforcement.

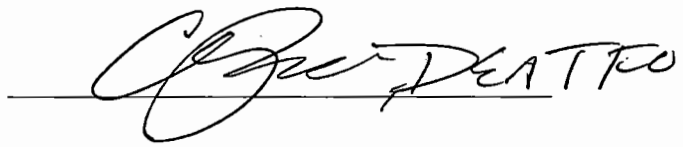
Throughout this investigation, agents utilized Administrative Subpoenas and Court Orders to gather subscriber information, toll records and text messages on cellular telephones utilized in the illegal activities of the Shawn FARRIS Drug Trafficking Organization. Although the subscriber information was inaccurate and incomplete in some cases, agents were able to identify the users through various means (debriefings, surveillances, search warrants, arrests, etc.). The collection of toll records also presented a challenge as many cellular telephone numbers were changed throughout the investigation. The information received from the telephone companies was accurate, however was not complete because of the time lost while tracking down new cellular telephone numbers. The information received allowed agents to further link specific events to the organization, and also allowed agents to discount certain events that were not relevant to the overall conspiracy.

### **REQUEST FOR SEALING**



It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and search warrant. I believe that sealing this document is necessary because the items and information to be seized are relevant to an ongoing investigation into the criminal organizations as not all of the targets of this investigation will be searched at this time. Based upon my training and experience, I have learned that, online criminals actively search for criminal affidavits and search warrants via the internet, and disseminate them to other online criminals as they deem appropriate, i.e., post them publicly online through the carding forums. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

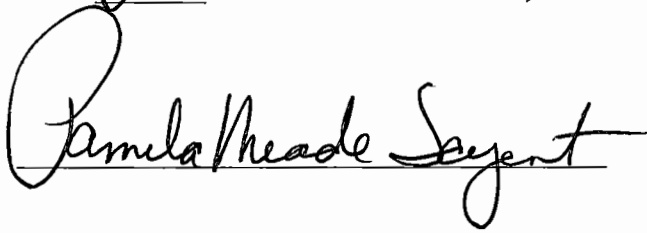
I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on September <sup>20th</sup> 2018, at Abingdon, Virginia.



Christopher L. Parks, TFO  
Drug Enforcement Administration

SWORN AND SUBSCRIBED TO BEFORE ME

THIS 20th DAY OF SEPTEMBER, 2018



HONORABLE JUDGE PAMELA MEADE SARGENT

UNITED STATES DISTRICT COURT IN THE

WESTERN DISTRICT OF VIRGINIA